



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

May 27, 2010

Mr. Gerardo C. Rios
Chief, Permits Office
U.S. EPA Region IX AIR 3
75 Hawthorne Street
San Francisco, CA 94105-3901

Dear Mr. Rios:

Subject: Firmenich dba MCP Foods – I.D. No. 2825, Title V Permit Modification

Firmenich dba MCP Foods (ID 2825) has proposed to revise their Title V Permit as follows:

- Change of condition to decrease the throughput limit on 12 drum dryers in the red line (Process 4, system 7)
- Change of condition to increase throughput and IPA limits on the continuous line (Process 4, system 9)

This is a flavor manufacturing facility located at 424 Atchison Street, Anaheim, CA.

The proposed permit revision is considered as a “deminimis significant permit revision” to their Title V Permit. Enclosed for your review are the permit evaluation and draft permit for the proposed permit revision. With your expected receipt of the proposed Title V permit revision today, we will note that the 45-day review period begins on May 27, 2010.

If you have any questions or need additional information regarding the proposed permit revision, please contact Ms. Dixie Richards at (909) 396-2395.

Sincerely,

A handwritten signature in black ink, appearing to read 'Brian L. Yeh', written over a horizontal line.

Brian L. Yeh
Senior Manager
Chemical/Mechanical Operations

BLY:DR
Enclosure



FACILITY PERMIT TO OPERATE MCP FOODS INC

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions * And Requirements	Conditions
Process 1: EXTERNAL COMBUSTION					
System 1: BOILERS					
BOILER, NATURAL GAS, CLEAVER-BROOKS, MODEL CEW700-750, WITH LOW NOX BURNER, 31.4 MMBTU/HR WITH A/N: 378926	D27		NOX: LARGE SOURCE**	CO: 100 PPMV (4) [RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]; CO: 2000 PPMV (5A) [RULE 407, 4-2-1982]; NOX: 9 PPMV NATURAL GAS (3) [RULE 2012, 5-6-2005]; NOX: 9 PPMV (4) [RULE 2005, 5-6-2005]; PM: 0.1 GRAINS/SCF (4) [RULE 409, 8-7-1981]	A63.1, D328.1, D328.4
BURNER, NATURAL GAS, ALZETA, MODEL CSB, WITH LOW NOX BURNER, 31.4 MMBTU/HR					
Process 2: STORAGE TANKS					
STORAGE TANK, UNDERGROUND, T-10, ISOPROPYL ALCOHOL, WITH NITROGEN BLANKET, VAPOR LOCK BALANCE RECOVERY SYSTEM, 30000 GALS; DIAMETER: 10 FT 6 IN; HEIGHT: 47 FT A/N: 278195	D4				B27.1, E144.1
STORAGE TANK, UNDERGROUND, NO. T-20, ISOPROPYL ALCOHOL, WITH TWO SETTLING TANKS (TOTES), 550 GALLONS EACH, WITH NITROGEN BLANKET, 10000 GALS; DIAMETER: 9 FT 6 IN; HEIGHT: 19 FT 11 IN A/N: 444628	D5	C204			B27.1, C1.6, E193.2

* (1) (1A) (1B) Denotes RECLAIM emission factor (2) (2A) (2B) Denotes RECLAIM emission rate
 (3) Denotes RECLAIM concentration limit (4) Denotes BACT emission limit
 (5) (5A) (5B) Denotes command and control emission limit (6) Denotes air toxic control rule limit
 (7) Denotes NSR applicability limit (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
 (9) See App B for Emission Limits (10) See section J for NESHAP/MACT requirements

** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.



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Process 2: STORAGE TANKS					
CONDENSER, REFRIGERATED, MOREHOUSE COWLES A/N:	C204	D5			A72.2, C6.1
Process 3: AIR POLLUTION CONTROL					
System 1: AIR POLLUTION CONTROL SYSTEM					
AFTERBURNER, CATALYTIC PRODUCTS INTERNATIONAL, NATURAL GAS, MODEL VECTOR-30, WITH CATALYTIC AFTERBURNER, LOW NOX BURNER, 5 MMBTU/HR A/N: 452717	C29	C30	NOX: PROCESS UNIT**	CO: 2000 PPMV NATURAL GAS (5A) [RULE 407, 4-2-1982]; NOX: 30 PPMV NATURAL GAS (4) [RULE 2005, 5-6-2005]; NOX: 130 LBS/MMSCF NATURAL GAS (1) [RULE 2012, 5-6-2005]; PM: 0.1 GRAINS/SCF NATURAL GAS (5A) [RULE 409, 8-7-1981]	A72.1, B27.1, C8.4, D12.4, D182.1, D328.2, D328.3

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Process 3: AIR POLLUTION CONTROL					
FILTER, DUST COLLECTOR, REVERSE PULSE JET CLEANING, WHEELABRATOR, MODEL SERIES 8, UNIT 88, SIXTY-FOUR CARTRIDGE FILTERS, 150 HP EXHAUST BLOWER, 12160 SQ.FT. A/N: 446620	C30	C29 D47 D49 D54 D55 D59 D60 D64 D65 D69 D70 D101 D102 D103 C109 C110 C111 C112 C113 C114 C115 C116 C117 C118 C119 C120 C121 C122 C123 C124 C125 C126 C127 C128 C129 C130 C131 C132 C133 C134 D150 C152 C153 D156 D157 C168 C170 C172 C174 C176 C178 C180 C182 C184 C186 C188 C190		PM: (9) [RULE 404, 2-7-1986]	D322.2, D323.2, E102.1
FILTER, DUST COLLECTOR, CARTRIDGE, DONALDSON TORIT, MODEL DFO-4-16, 30-HP EXHAUST BLOWER, 3040 SQ.FT. A/N: 447717	C196	D146 D147 D194 D195		PM: (9) [RULE 404, 2-7-1986]	D322.2, D323.2, E102.1
System 2: DUST CONTROL SYSTEM					

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Process 3: AIR POLLUTION CONTROL					
FILTER, DUST COLLECTOR, TWO CARTRIDGE FILTERS, FLEXICON, MODEL NO. BV-FB1W, 1.5 HP EXHAUST BLOWER, 100 SQ.FT. A/N: 447709	C31	D43		PM: (9) [RULE 404, 2-7-1986]	D322.1, D323.2, E102.1
FILTER, DUST COLLECTOR, TWO CARTRIDGE FILTERS, FLEXICON, MODEL NO. BV-FB1W, 1.5 HP EXHAUST BLOWER, 100 SQ.FT. A/N: 447710	C32	D44		PM: (9) [RULE 404, 2-7-1986]	D322.1, D323.2, E102.1
FILTER, DUST COLLECTOR, TWO CARTRIDGE FILTERS, FLEXICON, MODEL NO. BV-FB1W, 1.5 HP EXHAUST BLOWER, 100 SQ.FT. A/N: 447711	C33	D45		PM: (9) [RULE 404, 2-7-1986]	D322.1, D323.2, E102.1
FILTER, DUST COLLECTOR, TORIT DOWNFLOW, SIX CARTRIDGE FILTERS, DONALDSON, MODEL SDF-6, 7.5 HP EXHAUST BLOWER, 300 SQ.FT. A/N: 446620	C34	D50 D51 D52 D53		PM: (9) [RULE 404, 2-7-1986]	D322.1, D323.2, E102.1
Process 4: FOOD					
System 2: DEHYDRATION SYSTEM 2					
MIXER, FLAVORINGS, WITH A 5 HP AGITATOR, 2000 GALS; DIAMETER: 7 FT ; HEIGHT: 7 FT A/N: 451405	D146	C196		PM: (9) [RULE 405, 2-7-1986]	
MIXER, FLAVORINGS, WITH A 5 HP AGITATOR, 2000 GALS; DIAMETER: 7 FT ; HEIGHT: 7 FT A/N: 451405	D147	C196		PM: (9) [RULE 405, 2-7-1986]	

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Process 4: FOOD					
DRYER, SPRAY, NATURAL GAS, 7 MMBTU/HR WITH A/N: 451405 BURNER, NATURAL GAS, MAXON, MODEL CROSSFIRE, WITH LOW NOX BURNER, 7 MMBTU/HR	D23	D24	NOX: PROCESS UNIT**	CO: 2000 PPMV (5) [RULE 407, 4-2-1982]; NOX: 130 LBS/MMSCF (1) [RULE 2012, 5-6-2005]; PM: (9) [RULE 405, 2-7-1986]; PM: 0.1 GRAINS/SCF (5) [RULE 409, 8-7-1981]	B27.1, C1.1, C1.5, D323.2
CYCLONE, PRIMARY HOT, 1/2 H.P. DISCHARGE VALVE MOTOR, HEIGHT: 27 FT ; DIAMETER: 6 FT A/N: 451405	D24	D23 D25			
CYCLONE, SECONDARY HOT, 1/2 H.P. DISCHARGE VALVE MOTOR, HEIGHT: 27 FT ; DIAMETER: 6 FT A/N: 451405	D25	D24 C26			
SCRUBBER, VENTURI, HEIGHT: 16 FT ; DIAMETER: 11 FT A/N: 451404	C26	D25		PM: (9) [RULE 404, 2-7-1986]	C8.1, C8.2, D323.2, E149.1, E193.1
System 3: FLAVOR EXTRACTION SYSTEM NO. 1 (SILVER LINE)					
TANK, QUENCH, ISOPROPYL ALCOHOL, 50 GALS; WIDTH: 2 FT 8 IN; HEIGHT: 5 FT 6 IN; LENGTH: 1 FT 10 IN A/N: 386708	D54	C30			B27.1

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Process 4: FOOD					
TANK, QUENCH, ISOPROPYL ALCOHOL, 50 GALS; WIDTH: 2 FT 8 IN; HEIGHT: 5 FT 6 IN; LENGTH: 1 FT 10 IN A/N: 386708	D55	C30			B27.1
TANK, RECIRCULATION, ISOPROPYL ALCOHOL, 230 GALS; DIAMETER: 3 FT 6 IN; HEIGHT: 4 FT 10 IN A/N: 386708	D56				B27.1
FUGITIVE EMISSIONS, MISCELLANEOUS, HYDROCYCLONE, KREBS, ISOPROPYL ALCOHOL, MODEL P4-SS-752, LENGTH: 2 FT 1 IN; DIAMETER: 5 IN A/N: 386708	D57				
CENTRIFUGE, 30 HP MOTOR, TEMA SYSTEMS, ISOPROPYL ALCOHOL, LENGTH: 1 FT 7 IN; DIAMETER: 1 FT 6 IN A/N: 386708	D58				B27.1
System 4: FLAVOR EXTRACTION SYSTEM NO. 2 (YELLOW LINE)					S1.6
TANK, QUENCH, ISOPROPYL ALCOHOL, 50 GALS; WIDTH: 2 FT 8 IN; HEIGHT: 5 FT 6 IN; LENGTH: 1 FT 10 IN A/N: 386709	D59	C30			B27.1
TANK, QUENCH, ISOPROPYL ALCOHOL, 50 GALS; WIDTH: 2 FT 8 IN; HEIGHT: 5 FT 6 IN; LENGTH: 1 FT 10 IN A/N: 386709	D60	C30			B27.1

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Process 4: FOOD					
TANK, RECIRCULATION, ISOPROPYL ALCOHOL, 230 GALS; DIAMETER: 3 FT 6 IN; HEIGHT: 4 FT 10 IN A/N: 386709	D61				B27.1
FUGITIVE EMISSIONS, MISCELLANEOUS, HYDROCYCLONE, KREBS, ISOPROPYL ALCOHOL, MODEL P4-SS-752, LENGTH: 2 FT 1 IN; DIAMETER: 5 IN A/N: 386709	D62				
CENTRIFUGE, 30 HP MOTOR, TEMA SYSTEMS, ISOPROPYL ALCOHOL, LENGTH: 1 FT 4 IN; DIAMETER: 2 FT 1 IN A/N: 386709	D63				B27.1
System 5: FLAVOR EXTRACTION SYSTEM NO. 3 (ORANGE LINE)					S1.7
TANK, QUENCH, ISOPROPYL ALCOHOL, 50 GALS; WIDTH: 2 FT 8 IN; HEIGHT: 5 FT 6 IN; LENGTH: 1 FT 10 IN A/N: 386710	D64	C30			B27.1
TANK, QUENCH, ISOPROPYL ALCOHOL, 50 GALS; WIDTH: 2 FT 8 IN; HEIGHT: 5 FT 6 IN; LENGTH: 1 FT 10 IN A/N: 386710	D65	C30			B27.1
TANK, RECIRCULATION, ISOPROPYL ALCOHOL, 230 GALS; DIAMETER: 3 FT 6 IN; HEIGHT: 4 FT 10 IN A/N: 386710	D66				B27.1

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|---|---|
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Process 4: FOOD					
FUGITIVE EMISSIONS, MISCELLANEOUS, HYDROCYCLONE, KREBS, ISOPROPYL ALCOHOL, MODEL P4-SS-752, LENGTH: 2 FT 1 IN; DIAMETER: 5 IN A/N: 386710	D67				
CENTRIFUGE, 30 HP MOTOR, TEMA SYSTEMS, ISOPROPYL ALCOHOL, LENGTH: 1 FT 4 IN; DIAMETER: 2 FT 1 IN A/N: 386710	D68				B27.1
System 6: FLAVOR EXTRACTION SYSTEM NO. 4 (TAN LINE)					S1.8
TANK, QUENCH, ISOPROPYL ALCOHOL, 50 GALS; WIDTH: 2 FT 8 IN; HEIGHT: 5 FT 6 IN; LENGTH: 1 FT 10 IN A/N: 386711	D69	C30			B27.1
TANK, QUENCH, ISOPROPYL ALCOHOL, 50 GALS; WIDTH: 2 FT 8 IN; HEIGHT: 5 FT 6 IN; LENGTH: 1 FT 10 IN A/N: 386711	D70	C30			B27.1
TANK, RECIRCULATION, ISOPROPYL ALCOHOL, 230 GALS; DIAMETER: 3 FT 6 IN; HEIGHT: 4 FT 10 IN A/N: 386711	D71				B27.1

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Process 4: FOOD					
FUGITIVE EMISSIONS, MISCELLANEOUS, HYDROCYCLONE, KREBS, ISOPROPYL ALCOHOL, MODEL P4-SS-752, LENGTH: 2 FT 1 IN; DIAMETER: 5 IN A/N: 386711	D72				
CENTRIFUGE, 30 HP MOTOR, TEMA SYSTEMS, ISOPROPYL ALCOHOL, LENGTH: 1 FT 7 IN; DIAMETER: 1 FT 5 IN A/N: 386711	D73				B27.1
System 7: FLAVOR EXTRACTION DRYING SYSTEM					
DRYER, ROTARY, NO. 1, STEAM HEATED, LENGTH: 4 FT 6 IN; DIAMETER: 4 FT 6 IN A/N: 386712	D74	C109			B27.1
CYCLONE, AGET MANUFACTURING, MODEL 8N50-D1, HEIGHT: 2 FT ; DIAMETER: 1 FT A/N: 386798	C109	C30 D74			
DRYER, ROTARY, NO. 2, STEAM HEATED, LENGTH: 4 FT 6 IN; DIAMETER: 4 FT 6 IN A/N: 386713	D75	C110			B27.1
CYCLONE, AGET MANUFACTURING, MODEL 8N50-D1, HEIGHT: 2 FT ; DIAMETER: 1 FT A/N: 386799	C110	C30 D75			

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Process 4: FOOD					
DRYER, ROTARY, NO. 3, STEAM HEATED 4-1/2 FT DIA. X 4-1/2 FT L. A/N: 386714	D76	C111			B27.1
CYCLONE, AGET MANUFACTURING, MODEL 8N50-D1, HEIGHT: 2 FT ; DIAMETER: 1 FT A/N: 386800	C111	C30 D76			
DRYER, ROTARY, NO. 4, STEAM HEATED 4-1/2 FT DIA. X 4-1/2 FT L. A/N: 386715	D77	C112			B27.1
CYCLONE, AGET MANUFACTURING, MODEL 8N50-D1, HEIGHT: 2 FT ; DIAMETER: 1 FT A/N: 386805	C112	C30 D77			
DRYER, ROTARY, NO. 5, STEAM HEATED 4-1/2 FT DIA. X 4-1/2 FT L. A/N: 386716	D78	C113			B27.1
CYCLONE, AGET MANUFACTURING, MODEL 8N50-D1, HEIGHT: 2 FT ; DIAMETER: 1 FT A/N: 386806	C113	C30 D78			
DRYER, ROTARY, NO. 6, STEAM HEATED 4-1/2 FT DIA. X 4-1/2 FT L. A/N: 386717	D79	C114			B27.1
CYCLONE, AGET MANUFACTURING, MODEL 8N50-D1, HEIGHT: 2 FT ; DIAMETER: 1 FT A/N: 386807	C114	C30 D79			

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Process 4: FOOD					
DRYER, ROTARY, NO. 7, STEAM HEATED 4-1/2 FT DIA. X 4-1/2 FT L. A/N: 386718	D80	C115			B27.1
CYCLONE, AGET MANUFACTURING, MODEL 8N50-D1, HEIGHT: 2 FT ; DIAMETER: 1 FT A/N: 386808	C115	C30 D80			
DRYER, ROTARY, NO. 8, STEAM HEATED 4-1/2 FT DIA. X 4-1/2 FT L. A/N: 386725	D81	C116			B27.1
CYCLONE, AGET MANUFACTURING, MODEL 8N50-D1, HEIGHT: 2 FT ; DIAMETER: 1 FT A/N: 386809	C116	C30 D81			
DRYER, ROTARY, NO. 9, STEAM HEATED 4-1/2 FT DIA. X 4-1/2 FT L. A/N: 386729	D82	C117			B27.1
CYCLONE, AGET MANUFACTURING, MODEL 8N50-D1, HEIGHT: 2 FT ; DIAMETER: 1 FT A/N: 386810	C117	C30 D82			
DRYER, ROTARY, NO. 10, STEAM HEATED 4-1/2 FT DIA. X 4-1/2 FT L. A/N: 386733	D83	C118			B27.1
CYCLONE, AGET MANUFACTURING, MODEL 8N50-D1, HEIGHT: 2 FT ; DIAMETER: 1 FT A/N: 386811	C118	C30 D83			

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Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 4: FOOD					
DRYER, ROTARY, NO. 11, STEAM HEATED 4-1/2 FT DIA. X 4-1/2 FT L. A/N: 386734	D84	C119			B27.1
CYCLONE, AGET MANUFACTURING, MODEL 8N50-D1, HEIGHT: 2 FT ; DIAMETER: 1 FT A/N: 386812	C119	C30 D84			
DRYER, ROTARY, NO. 12, STEAM HEATED 4-1/2 FT DIA. X 4-1/2 FT L. A/N: 386737	D85	C120			B27.1
CYCLONE, AGET MANUFACTURING, MODEL 8N50-D1, HEIGHT: 2 FT ; DIAMETER: 1 FT A/N: 386813	C120	C30 D85			
DRYER, ROTARY, NO. 13, STEAM HEATED 4-1/2 FT DIA. X 4-1/2 FT L. A/N: 386738	D86	C121			B27.1
CYCLONE, AGET MANUFACTURING, MODEL 8N50-D1, HEIGHT: 2 FT ; DIAMETER: 1 FT A/N: 386815	C121	C30 D86			
DRYER, ROTARY, NO. 14, STEAM HEATED 4-1/2 FT DIA. X 4-1/2 FT L. A/N: 386740	D87	C122			B27.1
CYCLONE, AGET MANUFACTURING, MODEL 8N50-D1, HEIGHT: 2 FT ; DIAMETER: 1 FT A/N: 386816	C122	C30 D87			

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| <ul style="list-style-type: none"> * (1) (1A) (1B) Denotes RECLAIM emission factor (3) Denotes RECLAIM concentration limit (5) (5A) (5B) Denotes command and control emission limit (7) Denotes NSR applicability limit (9) See App B for Emission Limits | <ul style="list-style-type: none"> (2) (2A) (2B) Denotes RECLAIM emission rate (4) Denotes BACT emission limit (6) Denotes air toxic control rule limit (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.) (10) See section J for NESHAP/MACT requirements |
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** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.



FACILITY PERMIT TO OPERATE MCP FOODS INC

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 4: FOOD					
DRYER, ROTARY, NO. 15, STEAM HEATED 4-1/2 FT DIA. X 4-1/2 FT L. A/N: 386741	D88	C123			B27.1
CYCLONE, AGET MANUFACTURING, MODEL 8N50-D1, HEIGHT: 2 FT ; DIAMETER: 1 FT A/N: 386817	C123	C30 D88			
DRYER, ROTARY, NO. 16, STEAM HEATED 4-1/2 FT DIA. X 4-1/2 FT L. A/N: 386742	D89	C124			B27.1
CYCLONE, AGET MANUFACTURING, MODEL 8N50-D1, HEIGHT: 2 FT ; DIAMETER: 1 FT A/N: 386818	C124	C30 D89			
DRYER, ROTARY, NO. 17, STEAM HEATED 4-1/2 FT DIA. X 4-1/2 FT L. A/N: 386744	D90	C125			B27.1
CYCLONE, AGET MANUFACTURING, MODEL 8N50-D1, HEIGHT: 2 FT ; DIAMETER: 1 FT A/N: 386819	C125	C30 D90			
DRYER, ROTARY, NO. 18, STEAM HEATED 4-1/2 FT DIA. X 4-1/2 FT L. A/N: 386745	D91	C126			B27.1
CYCLONE, AGET MANUFACTURING, MODEL 8N50-D1, HEIGHT: 2 FT ; DIAMETER: 1 FT A/N: 386820	C126	C30 D91			

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|--|--|
| <ul style="list-style-type: none"> * (1) (1A) (1B) Denotes RECLAIM emission factor (3) Denotes RECLAIM concentration limit (5) (5A) (5B) Denotes command and control emission limit (7) Denotes NSR applicability limit (9) See App B for Emission Limits | <ul style="list-style-type: none"> (2) (2A) (2B) Denotes RECLAIM emission rate (4) Denotes BACT emission limit (6) Denotes air toxic control rule limit (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.) (10) See section J for NESHAP/MACT requirements |
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FACILITY PERMIT TO OPERATE MCP FOODS INC

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 4: FOOD					
DRYER, ROTARY, NO. 19, STEAM HEATED 4-1/2 FT DIA. X 4-1/2 FT L. A/N: 386746	D92	C127			B27.1
CYCLONE, AGET MANUFACTURING, MODEL 8N50-D1, HEIGHT: 2 FT ; DIAMETER: 1 FT A/N: 386821	C127	C30 D92			
DRYER, ROTARY, NO. 20, STEAM HEATED 4-1/2 FT DIA. X 4-1/2 FT L. A/N: 386748	D93	C128			B27.1
CYCLONE, AGET MANUFACTURING, MODEL 8N50-D1, HEIGHT: 2 FT ; DIAMETER: 1 FT A/N: 386822	C128	C30 D93			
DRYER, ROTARY, NO. 21, STEAM HEATED 4-1/2 FT DIA. X 4-1/2 FT L. A/N: 386750	D94	C129			B27.1
CYCLONE, AGET MANUFACTURING, MODEL 8N50-D1, HEIGHT: 2 FT ; DIAMETER: 1 FT A/N: 386823	C129	C30 D94			
DRYER, ROTARY, NO. 22, STEAM HEATED 4-1/2 FT DIA. X 4-1/2 FT L. A/N: 386751	D95	C130			B27.1
CYCLONE, AGET MANUFACTURING, MODEL 8N50-D1, HEIGHT: 2 FT ; DIAMETER: 1 FT A/N: 386824	C130	C30 D95			

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|---|---|
| <p>* (1) (1A) (1B) Denotes RECLAIM emission factor
(3) Denotes RECLAIM concentration limit
(5) (5A) (5B) Denotes command and control emission limit
(7) Denotes NSR applicability limit
(9) See App B for Emission Limits</p> | <p>(2) (2A) (2B) Denotes RECLAIM emission rate
(4) Denotes BACT emission limit
(6) Denotes air toxic control rule limit
(8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
(10) See section J for NESHAP/MACT requirements</p> |
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FACILITY PERMIT TO OPERATE MCP FOODS INC

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions * And Requirements	Conditions
Process 4: FOOD					
DRYER, ROTARY, NO. 23, STEAM HEATED 4-1/2 FT DIA. X 4-1/2 FT L. A/N: 386752	D96	C131			B27.1
CYCLONE, AGET MANUFACTURING, MODEL 8N50-D1, HEIGHT: 2 FT ; DIAMETER: 1 FT A/N: 386825	C131	C30 D96			
DRYER, ROTARY, NO. 24, STEAM HEATED 4-1/2 FT DIA. X 4-1/2 FT L. A/N: 386753	D97	C132			B27.1
CYCLONE, AGET MANUFACTURING, MODEL 8N50-D1, HEIGHT: 2 FT ; DIAMETER: 1 FT A/N: 386826	C132	C30 D97			
DRYER, ROTARY, NO. 25, STEAM HEATED 4-1/2 FT DIA. X 4-1/2 FT L. A/N: 386755	D98	C133			B27.1
CYCLONE, AGET MANUFACTURING, MODEL 8N50-D1, HEIGHT: 2 FT ; DIAMETER: 1 FT A/N: 386827	C133	C30 D98			
DRYER, ROTARY, NO. 26, STEAM HEATED 4-1/2 FT DIA. X 4-1/2 FT L. A/N: 386756	D99	C134			B27.1
CYCLONE, AGET MANUFACTURING, MODEL 8N50-D1, HEIGHT: 2 FT ; DIAMETER: 1 FT A/N: 386814	C134	C30 D99			

* (1) (1A) (1B) Denotes RECLAIM emission factor	(2) (2A) (2B) Denotes RECLAIM emission rate
(3) Denotes RECLAIM concentration limit	(4) Denotes BACT emission limit
(5) (5A) (5B) Denotes command and control emission limit	(6) Denotes air toxic control rule limit
(7) Denotes NSR applicability limit	(8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
(9) See App B for Emission Limits	(10) See section J for NESHAP/MACT requirements

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FACILITY PERMIT TO OPERATE MCP FOODS INC

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 4: FOOD					
DRYER, ROTARY, STEAM HEATED, PILOT NO. 1 (SMALL) A/N: 386759	D100				B27.1
DRYER, ROTARY, STEAM HEATED, PILOT NO. 2 (SMALL) A/N: 386763	D101	C30			B27.1
DRYER, ROTARY, STEAM HEATED, PILOT NO. 3 (SMALL) A/N: 386766	D102	C30			B27.1
DRYER, ROTARY, STEAM HEATED, PILOT NO. 4 (SMALL) A/N: 386768	D103	C30			B27.1
DRYER, ROTARY, RED LINE NO. 1, STEAM HEATED, ABC SHEETMETAL, 2-HP DRIVE MOTOR, LENGTH: 4 FT 6 IN; DIAMETER: 4 FT 6 IN A/N:	D167	C168			B27.1, C1.9
CYCLONE, AGET MANUFACTURING, MODEL 8N50-P, HEIGHT: 2 FT ; DIAMETER: 1 FT A/N:	C168	C30 D167			
DRYER, ROTARY, RED LINE NO. 2, STEAM HEATED, ABC SHEETMETAL, 2-HP DRIVE MOTOR, LENGTH: 4 FT 6 IN; DIAMETER: 4 FT 6 IN A/N:	D169	C170			B27.1, C1.9
CYCLONE, AGET MANUFACTURING, MODEL 8N50-P, HEIGHT: 2 FT ; DIAMETER: 1 FT A/N:	C170	C30 D169			

- * (1) (1A) (1B) Denotes RECLAIM emission factor
- (3) Denotes RECLAIM concentration limit
- (5) (5A) (5B) Denotes command and control emission limit
- (7) Denotes NSR applicability limit
- (9) See App B for Emission Limits
- (2) (2A) (2B) Denotes RECLAIM emission rate
- (4) Denotes BACT emission limit
- (6) Denotes air toxic control rule limit
- (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
- (10) See section J for NESHAP/MACT requirements

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FACILITY PERMIT TO OPERATE MCP FOODS INC

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions * And Requirements	Conditions
Process 4: FOOD					
DRYER, ROTARY, RED LINE NO. 3, STEAM HEATED, ABC SHEETMETAL, 2-HP DRIVE MOTOR, LENGTH: 4 FT 6 IN; DIAMETER: 4 FT 6 IN A/N:	D171	C172			B27.1, C1.9
CYCLONE, AGET MANUFACTURING, MODEL 8N50-P, HEIGHT: 2 FT ; DIAMETER: 1 FT A/N:	C172	C30 D171			
DRYER, ROTARY, RED LINE NO. 4, STEAM HEATED, ABC SHEETMETAL, 2-HP DRIVE MOTOR, LENGTH: 4 FT 6 IN; DIAMETER: 4 FT 6 IN A/N:	D173	C174			B27.1, C1.9
CYCLONE, AGET MANUFACTURING, MODEL 8N50-P, HEIGHT: 2 FT ; DIAMETER: 1 FT A/N:	C174	C30 D173			
DRYER, ROTARY, RED LINE NO. 5, STEAM HEATED, ABC SHEETMETAL, 2-HP DRIVE MOTOR, LENGTH: 4 FT 6 IN; DIAMETER: 4 FT 6 IN A/N:	D175	C176			B27.1, C1.9
CYCLONE, AGET MANUFACTURING, MODEL 8N50-P, HEIGHT: 2 FT ; DIAMETER: 1 FT A/N:	C176	C30 D175			

- * (1) (1A) (1B) Denotes RECLAIM emission factor
- (3) Denotes RECLAIM concentration limit
- (5) (5A) (5B) Denotes command and control emission limit
- (7) Denotes NSR applicability limit
- (9) See App B for Emission Limits
- (2) (2A) (2B) Denotes RECLAIM emission rate
- (4) Denotes BACT emission limit
- (6) Denotes air toxic control rule limit
- (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
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FACILITY PERMIT TO OPERATE MCP FOODS INC

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 4: FOOD					
DRYER, ROTARY, RED LINE NO. 6, STEAM HEATED, ABC SHEETMETAL, 2-HP DRIVE MOTOR, LENGTH: 4 FT 6 IN; DIAMETER: 4 FT 6 IN A/N:	D177	C178			B27.1, C1.9
CYCLONE, AGET MANUFACTURING, MODEL 8N50-P, HEIGHT: 2 FT ; DIAMETER: 1 FT A/N:	C178	C30 D177			
DRYER, ROTARY, RED LINE NO. 7, STEAM HEATED, ABC SHEETMETAL, 2-HP DRIVE MOTOR, LENGTH: 4 FT 6 IN; DIAMETER: 4 FT 6 IN A/N:	D179	C180			B27.1, C1.9
CYCLONE, AGET MANUFACTURING, MODEL 8N50-P, HEIGHT: 2 FT ; DIAMETER: 1 FT A/N:	C180	C30 D179			
DRYER, ROTARY, RED LINE NO. 8, STEAM HEATED, ABC SHEETMETAL, 2-HP DRIVE MOTOR, LENGTH: 4 FT 6 IN; DIAMETER: 4 FT 6 IN A/N:	D181	C182			B27.1, C1.9
CYCLONE, AGET MANUFACTURING, MODEL 8N50-P, HEIGHT: 2 FT ; DIAMETER: 1 FT A/N:	C182	C30 D181			

* (1) (1A) (1B) Denotes RECLAIM emission factor
 (2) (2A) (2B) Denotes RECLAIM emission rate
 (3) Denotes RECLAIM concentration limit
 (4) Denotes BACT emission limit
 (5) (5A) (5B) Denotes command and control emission limit
 (6) Denotes air toxic control rule limit
 (7) Denotes NSR applicability limit
 (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
 (9) See App B for Emission Limits
 (10) See section J for NESHAP/MACT requirements

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**FACILITY PERMIT TO OPERATE
MCP FOODS INC**

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions * And Requirements	Conditions
Process 4: FOOD					
DRYER, ROTARY, RED LINE NO. 9, STEAM HEATED, ABC SHEETMETAL, 2-HP DRIVE MOTOR, LENGTH: 4 FT 6 IN; DIAMETER: 4 FT 6 IN A/N:	D183	C184			B27.1, C1.9
CYCLONE, AGET MANUFACTURING, MODEL 8N50-P, HEIGHT: 2 FT ; DIAMETER: 1 FT A/N:	C184	C30 D183			
DRYER, ROTARY, RED LINE NO. 10, STEAM HEATED, ABC SHEETMETAL, 2-HP DRIVE MOTOR, LENGTH: 4 FT 6 IN; DIAMETER: 4 FT 6 IN A/N:	D185	C186			B27.1, C1.9
CYCLONE, AGET MANUFACTURING, MODEL 8N50-P, HEIGHT: 2 FT ; DIAMETER: 1 FT A/N:	C186	C30 D185			
DRYER, ROTARY, RED LINE NO. 11, STEAM HEATED, ABC SHEETMETAL, 2-HP DRIVE MOTOR, LENGTH: 4 FT 6 IN; DIAMETER: 4 FT 6 IN A/N:	D187	C188			B27.1, C1.9
CYCLONE, AGET MANUFACTURING, MODEL 8N50-P, HEIGHT: 2 FT ; DIAMETER: 1 FT A/N:	C188	C30 D187			

* (1) (1A) (1B) Denotes RECLAIM emission factor
(3) Denotes RECLAIM concentration limit
(5) (5A) (5B) Denotes command and control emission limit
(7) Denotes NSR applicability limit
(9) See App B for Emission Limits
(2) (2A) (2B) Denotes RECLAIM emission rate
(4) Denotes BACT emission limit
(6) Denotes air toxic control rule limit
(8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
(10) See section J for NESHAP/MACT requirements

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FACILITY PERMIT TO OPERATE MCP FOODS INC

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions * And Requirements	Conditions
Process 4: FOOD					
DRYER, ROTARY, RED LINE NO. 12, STEAM HEATED, ABC SHEETMETAL, 2-HP DRIVE MOTOR, LENGTH: 4 FT 6 IN; DIAMETER: 4 FT 6 IN A/N:	D189	C190			B27.1, C1.9
CYCLONE, AGET MANUFACTURING, MODEL 8N50-P, HEIGHT: 2 FT ; DIAMETER: 1 FT A/N:	C190	C30 D189			
System 8: FLAVOR EXTRACTION SCREENING SYSTEM					
SCREEN, CLASSIFYING, VIBRATING, FOOD FLAVOR CRYSTALS A/N: 386774	D104			PM: (9) [RULE 405, 2-7-1986]	D323.1
SCREEN, CLASSIFYING, VIBRATING, FOOD FLAVOR CRYSTALS A/N: 386777	D105			PM: (9) [RULE 405, 2-7-1986]	D323.1
SCREEN, CLASSIFYING, VIBRATING, FOOD FLAVOR CRYSTALS A/N: 386794	D106			PM: (9) [RULE 405, 2-7-1986]	D323.1
SCREEN, CLASSIFYING, VIBRATING, FOOD FLAVOR CRYSTALS A/N: 386796	D107			PM: (9) [RULE 405, 2-7-1986]	D323.1
SCREEN, CLASSIFYING, VIBRATING, FOOD FLAVOR CRYSTALS A/N: 386797	D108			PM: (9) [RULE 405, 2-7-1986]	D323.1
SCREEN, CLASSIFYING, VIBRATING, J LINE, SWECO, FOOD FLAVOR CRYSTALS, CIRCULAR STYLE, PORTABLE WITH A 2 1/2 HP MOTOR A/N: 446679	D191			PM: (9) [RULE 405, 2-7-1986]	D323.1

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| * (1) (1A) (1B) Denotes RECLAIM emission factor | (2) (2A) (2B) Denotes RECLAIM emission rate |
| (3) Denotes RECLAIM concentration limit | (4) Denotes BACT emission limit |
| (5) (5A) (5B) Denotes command and control emission limit | (6) Denotes air toxic control rule limit |
| (7) Denotes NSR applicability limit | (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.) |
| (9) See App B for Emission Limits | (10) See section J for NESHAP/MACT requirements |

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FACILITY PERMIT TO OPERATE MCP FOODS INC

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions * And Requirements	Conditions
Process 4: FOOD					
SCREEN, CLASSIFYING, VIBRATING, RED LINE #1, SWECO, FOOD FLAVOR CRYSTALS, CIRCULAR STYLE, PORTABLE WITH A 2 1/2 HP MOTOR A/N: 446680	D192			PM: (9) [RULE 405, 2-7-1986]	D323.1
SCREEN, CLASSIFYING, VIBRATING, RED LINE #2, SWECO, FOOD FLAVOR CRYSTALS, CIRCULAR STYLE, PORTABLE WITH A 2 1/2 HP MOTOR A/N: 446681	D193			PM: (9) [RULE 405, 2-7-1986]	D323.1
SCREEN, CLASSIFYING, VIBRATING, #6, SWECO, FOOD FLAVOR CRYSTALS, CIRCULAR STYLE, PORTABLE WITH A 2 1/2 HP MOTOR A/N: 463669	D199			PM: (9) [RULE 405, 2-7-1986]	D323.1
SCREEN, CLASSIFYING, VIBRATING, #31, SWECO, FOOD FLAVOR CRYSTALS, CIRCULAR STYLE, PORTABLE WITH A 2 1/2 HP MOTOR A/N: 463670	D200			PM: (9) [RULE 405, 2-7-1986]	D323.1
SCREEN, CLASSIFYING, VIBRATING, #48, SWECO, FOOD FLAVOR CRYSTALS, CIRCULAR STYLE, PORTABLE WITH A 2 1/2 HP MOTOR A/N: 463671	D201			PM: (9) [RULE 405, 2-7-1986]	D323.1

- * (1) (1A) (1B) Denotes RECLAIM emission factor
- (3) Denotes RECLAIM concentration limit
- (5) (5A) (5B) Denotes command and control emission limit
- (7) Denotes NSR applicability limit
- (9) See App B for Emission Limits
- (2) (2A) (2B) Denotes RECLAIM emission rate
- (4) Denotes BACT emission limit
- (6) Denotes air toxic control rule limit
- (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
- (10) See section J for NESHAP/MACT requirements

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FACILITY PERMIT TO OPERATE MCP FOODS INC

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 4: FOOD					
SCREEN, CLASSIFYING, VIBRATING, CDL2, SWECO, FOOD FLAVOR CRYSTALS, CIRCULAR STYLE, PORTABLE WITH A 2 1/2 HP MOTOR A/N: 463673	D202			PM: (9) [RULE 405, 2-7-1986]	D323.1
System 9: CONTINUOUS LINE					S1.3, S1.4
BULK MATERIAL UNLOADING STATION, NO. 1 A/N: 446623	D43	C31		PM: (9) [RULE 405, 2-7-1986]	D323.2
BULK MATERIAL UNLOADING STATION, NO. 2 A/N: 446623	D44	C32		PM: (9) [RULE 405, 2-7-1986]	D323.2
BULK MATERIAL UNLOADING STATION, NO. 3 A/N: 446623	D45	C33		PM: (9) [RULE 405, 2-7-1986]	D323.2
TANK, ISOPROPYL ALCOHOL, 230 GALS; DIAMETER: 3 FT ; HEIGHT: 4 FT 4 IN A/N: 446623	D46				B27.1
CONVEYOR, HAPMAN, MODEL NO. 4000 A/N: 446623	D50	C34		PM: (9) [RULE 405, 2-7-1986]	D323.2
FEDER, SCREW, FLEXWALL, MODEL NO. FW33 A/N: 446623	D51	C34		PM: (9) [RULE 405, 2-7-1986]	D323.2
SCREEN, CLASSIFYING, VIBRATORY, SOUTHWESTERN VIBRECON, WITH A 1/3 HP MOTOR A/N: 446623	D52	C34		PM: (9) [RULE 405, 2-7-1986]	D323.1
HOPPER A/N: 446623	D53	C34		PM: (9) [RULE 405, 2-7-1986]	D323.2

- * (1) (1A) (1B) Denotes RECLAIM emission factor
- (3) Denotes RECLAIM concentration limit
- (5) (5A) (5B) Denotes command and control emission limit
- (7) Denotes NSR applicability limit
- (9) See App B for Emission Limits
- (2) (2A) (2B) Denotes RECLAIM emission rate
- (4) Denotes BACT emission limit
- (6) Denotes air toxic control rule limit
- (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
- (10) See section J for NESHAP/MACT requirements

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FACILITY PERMIT TO OPERATE MCP FOODS INC

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 4: FOOD					
TANK, QUENCH, CUSTOM, ISOPROPYL ALCOHOL WITH ONE 10 HP DISINTEGRATOR MOTOR, 50 GALS A/N: 446623	D156	C30			B27.1, E17.1
TANK, QUENCH, CUSTOM, ISOPROPYL ALCOHOL WITH ONE 10 HP DISINTEGRATOR MOTOR, 50 GALS A/N: 446623	D47	C30			B27.1, E17.1
CENTRIFUGE, TEMA SYSTEMS, MODEL NO. TS-360-FK, DECANTER A/N: 446623	D48				B27.1
DRYER, STEAM HEATED, TWO 10 HP REC FANS, ONE 20 HP EX FAN AND ONE 5 HP DRIVE MOTOR A/N: 446623	D49	C30		PM: (9) [RULE 405, 2-7-1986]	B27.1, D323.2
CYCLONE, WIDTH: 3 FT ; HEIGHT: 15 FT ; LENGTH: 3 FT A/N: 446623	D157	C30		PM: (9) [RULE 405, 2-7-1986]	
System 10: FLAVORED SUGAR DRYING					
DRYER, FLUIDIZED BED, STEAM HEATED, A/N: 458070	D137	D138 D139		PM: (9) [RULE 405, 2-7-1986]	C1.4, D323.1, K67.2
CYCLONE, VENTILEX, MODEL MEC-900, HEIGHT: 9 FT 5 IN; DIAMETER: 2 FT 11 IN A/N: 458070	D138	D137 C140		PM: (9) [RULE 405, 2-7-1986]	D323.1
CYCLONE, VENTILEX, MODEL MEC-900, HEIGHT: 9 FT 5 IN; DIAMETER: 2 FT 11 IN A/N: 458070	D139	D137 C140		PM: (9) [RULE 405, 2-7-1986]	D323.1

- * (1) (1A) (1B) Denotes RECLAIM emission factor
- (3) Denotes RECLAIM concentration limit
- (5) (5A) (5B) Denotes command and control emission limit
- (7) Denotes NSR applicability limit
- (9) See App B for Emission Limits
- (2) (2A) (2B) Denotes RECLAIM emission rate
- (4) Denotes BACT emission limit
- (6) Denotes air toxic control rule limit
- (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
- (10) See section J for NESHAP/MACT requirements

** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.



FACILITY PERMIT TO OPERATE MCP FOODS INC

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 4: FOOD					
BAGHOUSE, CARTRIDGE FILTER, DONALDSON TORIT, MODEL DFO3-24, 4560 SQ.FT.; 24 CARTRIDGE A/N: 458071	C140	D138 D139		PM: (9) [RULE 404, 2-7-1986]	C10.1, D12.5, D322.1, D381.1, E102.1
System 13: BLENDING					
BLENDER, NO. 1, HOMOGENIZING, CUSTOM BUILT, 7,000 POUND CAPACITY A/N: 447713	D194	C196		PM: (9) [RULE 405, 2-7-1986]	C1.10, D323.1
BLENDER, NO. 2, HOMOGENIZING, CUSTOM BUILT, 7,000 POUND CAPACITY A/N: 447716	D195	C196		PM: (9) [RULE 405, 2-7-1986]	C1.10, D323.1
Process 5: RULE 219 EXEMPT EQUIPMENT					
RULE 219 EXEMPT EQUIPMENT, COATING EQUIPMENT, PORTABLE, ARCHITECTURAL COATINGS	E17			VOC: (9) [RULE 1113, 11-8-1996; RULE 1113, 7-13-2007; RULE 1171, 11-7-2003; RULE 1171, 2-1-2008]	K67.1
RULE 219 EXEMPT EQUIPMENT, AIR CONDITIONING UNITS	E18				H23.1
RULE 219 EXEMPT EQUIPMENT, FLAVOR OIL BLENDING	E203				

* (1) (1A) (1B) Denotes RECLAIM emission factor
 (2) (2A) (2B) Denotes RECLAIM emission rate
 (3) Denotes RECLAIM concentration limit
 (4) Denotes BACT emission limit
 (5) (5A) (5B) Denotes command and control emission limit
 (6) Denotes air toxic control rule limit
 (7) Denotes NSR applicability limit
 (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
 (9) See App B for Emission Limits
 (10) See section J for NESHAP/MACT requirements

** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.



**FACILITY PERMIT TO OPERATE
MCP FOODS INC**

SECTION D: DEVICE ID INDEX

**The following sub-section provides an index
to the devices that make up the facility
description sorted by device ID.**



**FACILITY PERMIT TO OPERATE
MCP FOODS INC**

SECTION D: DEVICE ID INDEX

Device Index For Section D			
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D5	1	2	0
E17	24	5	0
E18	24	5	0
D23	5	4	2
D24	5	4	2
D25	5	4	2
C26	5	4	2
D27	1	1	1
C29	2	3	1
C30	3	3	1
C31	4	3	2
C32	4	3	2
C33	4	3	2
C34	4	3	2
D43	22	4	9
D44	22	4	9
D45	22	4	9
D46	22	4	9
D47	23	4	9
D48	23	4	9
D49	23	4	9
D50	22	4	9
D51	22	4	9
D52	22	4	9
D53	22	4	9
D54	5	4	3
D55	6	4	3
D56	6	4	3
D57	6	4	3
D58	6	4	3
D59	6	4	4
D60	6	4	4
D61	7	4	4
D62	7	4	4



**FACILITY PERMIT TO OPERATE
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SECTION D: DEVICE ID INDEX

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D64	7	4	5
D65	7	4	5
D66	7	4	5
D67	8	4	5
D68	8	4	5
D69	8	4	6
D70	8	4	6
D71	8	4	6
D72	9	4	6
D73	9	4	6
D74	9	4	7
D75	9	4	7
D76	10	4	7
D77	10	4	7
D78	10	4	7
D79	10	4	7
D80	11	4	7
D81	11	4	7
D82	11	4	7
D83	11	4	7
D84	12	4	7
D85	12	4	7
D86	12	4	7
D87	12	4	7
D88	13	4	7
D89	13	4	7
D90	13	4	7
D91	13	4	7
D92	14	4	7
D93	14	4	7
D94	14	4	7
D95	14	4	7
D96	15	4	7
D97	15	4	7



**FACILITY PERMIT TO OPERATE
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SECTION D: DEVICE ID INDEX

Device Index For Section D			
Device ID	Section D Page No.	Process	System
D98	15	4	7
D99	15	4	7
D100	16	4	7
D101	16	4	7
D102	16	4	7
D103	16	4	7
D104	20	4	8
D105	20	4	8
D106	20	4	8
D107	20	4	8
D108	20	4	8
C109	9	4	7
C110	9	4	7
C111	10	4	7
C112	10	4	7
C113	10	4	7
C114	10	4	7
C115	11	4	7
C116	11	4	7
C117	11	4	7
C118	11	4	7
C119	12	4	7
C120	12	4	7
C121	12	4	7
C122	12	4	7
C123	13	4	7
C124	13	4	7
C125	13	4	7
C126	13	4	7
C127	14	4	7
C128	14	4	7
C129	14	4	7
C130	14	4	7
C131	15	4	7
C132	15	4	7



**FACILITY PERMIT TO OPERATE
MCP FOODS INC**

SECTION D: DEVICE ID INDEX

Device Index For Section D			
Device ID	Section D Page No.	Process	System
C133	15	4	7
C134	15	4	7
D137	23	4	10
D138	23	4	10
D139	23	4	10
C140	24	4	10
D146	4	4	2
D147	4	4	2
D156	23	4	9
D157	23	4	9
D167	16	4	7
C168	16	4	7
D169	16	4	7
C170	16	4	7
D171	17	4	7
C172	17	4	7
D173	17	4	7
C174	17	4	7
D175	17	4	7
C176	17	4	7
D177	18	4	7
C178	18	4	7
D179	18	4	7
C180	18	4	7
D181	18	4	7
C182	18	4	7
D183	19	4	7
C184	19	4	7
D185	19	4	7
C186	19	4	7
D187	19	4	7
C188	19	4	7
D189	20	4	7
C190	20	4	7
D191	20	4	8



**FACILITY PERMIT TO OPERATE
MCP FOODS INC**

SECTION D: DEVICE ID INDEX

Device Index For Section D			
Device ID	Section D Page No.	Process	System
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D193	21	4	8
D194	24	4	13
D195	24	4	13
C196	3	3	1
D199	21	4	8
D200	21	4	8
D201	21	4	8
D202	22	4	8
E203	24	5	0
C204	2	2	0



FACILITY PERMIT TO OPERATE MCP FOODS INC

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

FACILITY CONDITIONS

F14.1 The operator shall not purchase diesel fuel containing sulfur compounds in excess of 15 ppm by weight as supplied by the supplier.

[RULE 431.2, 5-4-1990; RULE 431.2, 9-15-2000]

F14.2 The operator shall not burn diesel fuel containing sulfur compounds in excess of 500 ppm by weight.

[RULE 431.2, 5-4-1990; RULE 431.2, 9-15-2000]

SYSTEM CONDITIONS

S1.1 The operator shall limit the throughput to no more than 554400 lb(s) in any one calendar month.

For the purpose of this condition, throughput shall be defined as finished Durarome product from the Red Line.

The operator shall maintain records in a manner approved by the District to demonstrate compliance with this condition.

[RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002]

[Systems subject to this condition : Process 4, System 11]

S1.2 The operator shall limit the throughput to no more than 4000 lb(s) in any one day.



FACILITY PERMIT TO OPERATE MCP FOODS INC

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

For the purpose of this condition, throughput shall be defined as finished product from the J Line.

The operator shall maintain records in a manner approved by the District to demonstrate compliance with this condition.

[RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002]

[Systems subject to this condition : Process 4, System 12]

- S1.3 The operator shall limit the throughput to no more than 83,348 lb(s) in any one calendar month.

For the purpose of this condition, throughput shall be defined as isopropyl alcohol usage.

The operator shall maintain records in a manner approved by the District to demonstrate compliance with this condition.

[RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002]

[Systems subject to this condition : Process 4, System 9]

- S1.4 The operator shall limit the throughput to no more than 450000 lb(s) in any one calendar month.

For the purpose of this condition, throughput shall be defined as product from the Continuous Line, including off spec and discarded material.

The operator shall maintain records in a manner approved by the District to demonstrate compliance with this condition.

[RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002]



**FACILITY PERMIT TO OPERATE
MCP FOODS INC**

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

[Systems subject to this condition : Process 4, System 9]

S1.5 The operator shall limit the throughput to no more than 443520 lb(s) in any one calendar month.

For the purpose of this condition, throughput shall be defined as finished Durarome product from the Silver Line.

The operator shall maintain records in a manner approved by the District to demonstrate compliance with this condition.

[RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002]

[Systems subject to this condition : Process 4, System 3]

S1.6 The operator shall limit the throughput to no more than 403920 lb(s) in any one calendar month.

For the purpose of this condition, throughput shall be defined as finished Durarome product from the Yellow Line.

The operator shall maintain records in a manner approved by the District to demonstrate compliance with this condition.

[RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002]

[Systems subject to this condition : Process 4, System 4]

S1.7 The operator shall limit the throughput to no more than 261360 lb(s) in any one calendar month.



**FACILITY PERMIT TO OPERATE
MCP FOODS INC**

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

For the purpose of this condition, throughput shall be defined as finished Durarome product from the Orange Line.

The operator shall maintain records in a manner approved by the District to demonstrate compliance with this condition.

[RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002]

[Systems subject to this condition : Process 4, System 5]

S1.8 The operator shall limit the throughput to no more than 251460 lb(s) in any one calendar month.

For the purpose of this condition, throughput shall be defined as finished Durarome product from the Tan Line.

The operator shall maintain records in a manner approved by the District to demonstrate compliance with this condition.

[RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002]

[Systems subject to this condition : Process 4, System 6]

DEVICE CONDITIONS

A. Emission Limits

A63.1 The operator shall limit emissions from this equipment as follows:

CONTAMINANT	EMISSIONS LIMIT
CO	Less than 1689 LBS IN ANY ONE MONTH



**FACILITY PERMIT TO OPERATE
MCP FOODS INC**

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

[RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002]

[Devices subject to this condition : D27]

A72.1 The operator shall maintain this equipment to achieve a minimum overall control efficiency of 96.9 percent for VOC during the normal operation of the equipment it vents.

[RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002]

[Devices subject to this condition : C29]

A72.2 The operator shall maintain this equipment to achieve a minimum removal efficiency of 95 percent for VOC during the normal operation of the equipment it vents.

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]

[Devices subject to this condition : C204]

B. Material/Fuel Type Limits

B27.1 The operator shall not use materials containing any toxic air contaminants (TACs) identified in the SCAQMD Rule 1401 (except for those compounds listed below), as amended 03/04/2005.

COMPOUND	CAS NO.
Acetaldehyde	75-07-0
Isopropyl Alcohol	67-63-0

[RULE 1401, 3-4-2005]



FACILITY PERMIT TO OPERATE MCP FOODS INC

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

[Devices subject to this condition : D4, D5, D23, C29, D46, D47, D48, D49, D54, D55, D56, D58, D59, D60, D61, D63, D64, D65, D66, D68, D69, D70, D71, D73, D74, D75, D76, D77, D78, D79, D80, D81, D82, D83, D84, D85, D86, D87, D88, D89, D90, D91, D92, D93, D94, D95, D96, D97, D98, D99, D100, D101, D102, D103, D156, D167, D169, D171, D173, D175, D177, D179, D181, D183, D185, D187, D189]

C. Throughput or Operating Parameter Limits

C1.1 The operator shall limit the production rate to no more than 2200 lb(s)/hr.

[RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002]

[Devices subject to this condition : D23]

C1.4 The operator shall limit the material processed to no more than 480240 lb(s) in any one month.

To comply with this condition, the operator shall maintain adequate records. Such records shall be kept on the premises for at least five years and be made available to the Executive Officer or his representative upon request..

[RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002]

[Devices subject to this condition : D137]

C1.5 The operator shall limit the production rate to no more than 528000 lb(s) in any one calendar month.

[RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002]



FACILITY PERMIT TO OPERATE MCP FOODS INC

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

[Devices subject to this condition : D23]

- C1.6 The operator shall limit the throughput to no more than 68,000 gallon(s) in any one calendar month.

[RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002]

[Devices subject to this condition : D5]

- C1.9 The operator shall limit the throughput to no more than 183,040 lb(s) in any one calendar month.

For the purpose of this condition, material processed shall be defined as finished product in the Red Line.

This limit shall be based on the total combined limit for equipment D167, D169, D171, D173, D175, D177, D179, D181, D183, D185, D187 and D189.

The operator shall maintain records in a manner approved by the District, to demonstrate compliance with this condition.

[RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002]

[Devices subject to this condition : D167, D169, D171, D173, D175, D177, D179, D181, D183, D185, D187, D189]

- C1.10 The operator shall limit the throughput to no more than 1,386 ton(s) in any one calendar month.



FACILITY PERMIT TO OPERATE MCP FOODS INC

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

For the purpose of this condition, throughput shall be defined as finished product blended.

This limit shall be based on the total combined limit for equipment D194 and D195.

The operator shall maintain records in a manner approved by the District, to demonstrate compliance with this condition.

[RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002]

[Devices subject to this condition : D194, D195]

- C6.1 The operator shall use this equipment in such a manner that the temperature being monitored, as indicated below, does not exceed -25 Deg F.

To comply with this condition, the operator shall install and maintain a(n) temperature gauge to accurately indicate the temperature at the condenser outlet.

The operator shall also install and maintain a device to continuously record the parameter being measured.

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]

[Devices subject to this condition : C204]

- C8.1 The operator shall use this equipment in such a manner that the flow rate being monitored, as indicated below, is not less than 40 gpm.

To comply with this condition, the operator shall install and maintain a(n) flow meter to accurately indicate the flow rate being supplied to the recirculation line.

The operator shall determine and record the flow rate once every day.

[RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997]



FACILITY PERMIT TO OPERATE MCP FOODS INC

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

[Devices subject to this condition : C26]

- C8.2 The operator shall use this equipment in such a manner that the pressure being monitored, as indicated below, is not less than 30 Psig.

To comply with this condition, the operator shall install and maintain a(n) pressure gauge to accurately indicate the pressure of the recirculation line.

The operator shall determine and record the parameter being monitored once every day.

[RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997]

[Devices subject to this condition : C26]

- C8.4 The operator shall use this equipment in such a manner that the temperature being monitored, as indicated below, is not less than 600 Deg F.

To comply with this condition, the operator shall install and maintain a(n) temperature reading device to accurately indicate the temperature in the catalyst bed.

The operator shall also install and maintain a device to continuously record the temperature being measured.

[RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997]

[Devices subject to this condition : C29]

- C10.1 The operator shall use this equipment in such a manner that the differential pressure being monitored, as indicated below, is maintained between 0.5 and 6 inches water column.

[RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997]



FACILITY PERMIT TO OPERATE MCP FOODS INC

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

[Devices subject to this condition : C140]

D. Monitoring/Testing Requirements

D12.4 The operator shall install and maintain a(n) pressure sensing device to accurately indicate the pressure in the main exhaust duct and in each branch of the VOC emissions collection system.

[RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997]

[Devices subject to this condition : C29]

D12.5 The operator shall install and maintain a(n) differential pressure gauge to accurately indicate the differential pressure across the filter.

[RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997]

[Devices subject to this condition : C140]

D182.1 The operator shall test this equipment in accordance with the following specifications:

the activity of the catalyst shall be tested once per year.

[RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997]

[Devices subject to this condition : C29]

D322.1 The operator shall perform annual inspection of the equipment and filter media for leaks, broken or torn filter media, and improperly installed filter media.



FACILITY PERMIT TO OPERATE MCP FOODS INC

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

[RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997]

[Devices subject to this condition : C31, C32, C33, C34, C140]

D322.2 The operator shall perform a quarterly inspection of the equipment and filter media for leaks, broken or torn filter media, and improperly installed filter media.

[RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997]

[Devices subject to this condition : C30, C196]



FACILITY PERMIT TO OPERATE MCP FOODS INC

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

D323.1 The operator shall conduct an inspection for visible emissions from all stacks and other emission points of this equipment whenever there is a public complaint of visible emissions, whenever visible emissions are observed, and on an annual basis, at least, unless the equipment did not operate during the entire annual period. The routine annual inspection shall be conducted while the equipment is in operation and during daylight hours.

If any visible emissions (not including condensed water vapor) are detected that last more than three minutes in any one hour, the operator shall verify and certify within 24 hours that the equipment causing the emission and any associated air pollution control equipment are operating normally according to their design and standard procedures and under the same conditions under which compliance was achieved in the past, and either:

- 1). Take corrective action(s) that eliminates the visible emissions within 24 hours and report the visible emissions as a potential deviation in accordance with the reporting requirements in Section K of this permit; or
- 2). Have a CARB-certified smoke reader determine compliance with the opacity standard, using EPA Method 9 or the procedures in the CARB manual "Visible Emission Evaluation", within three business days and report any deviations to AQMD.

The operator shall keep the records in accordance with the recordkeeping requirements in Section K of this permit and the following records:

- 1). Stack or emission point identification;
- 2). Description of any corrective actions taken to abate visible emissions;
- 3). Date and time visible emission was abated; and
- 4). All visible emission observation records by operator or a certified smoke reader.



FACILITY PERMIT TO OPERATE MCP FOODS INC

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

[RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997]

[Devices subject to this condition : D52, D104, D105, D106, D107, D108, D137, D138, D139, D191, D192, D193, D194, D195, D199, D200, D201, D202]



FACILITY PERMIT TO OPERATE MCP FOODS INC

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

D323.2 The operator shall conduct an inspection for visible emissions from all stacks and other emission points of this equipment whenever there is a public complaint of visible emissions, whenever visible emissions are observed, and on a semi-annual basis, at least, unless the equipment did not operate during the entire semi-annual period. The routine semi-annual inspection shall be conducted while the equipment is in operation and during daylight hours.

If any visible emissions (not including condensed water vapor) are detected that last more than three minutes in any one hour, the operator shall verify and certify within 24 hours that the equipment causing the emission and any associated air pollution control equipment are operating normally according to their design and standard procedures and under the same conditions under which compliance was achieved in the past, and either:

- 1). Take corrective action(s) that eliminates the visible emissions within 24 hours and report the visible emissions as a potential deviation in accordance with the reporting requirements in Section K of this permit; or
- 2). Have a CARB-certified smoke reader determine compliance with the opacity standard, using EPA Method 9 or the procedures in the CARB manual "Visible Emission Evaluation", within three business days and report any deviations to AQMD.
In addition, the operator shall have a CARB-certified smoke reader determine compliance with the opacity standard, using EPA Method 9 or the procedures in the CARB manual "Visible Emission Evaluation", within 72 hours of conversion to fuel oil firing and on a weekly basis thereafter, until the equipment stops firing fuel oil.

The operator shall keep the records in accordance with the recordkeeping requirements in Section K of this permit and the following records:

- 1). Stack or emission point identification;
- 2). Description of any corrective actions taken to abate visible emissions;
- 3). Date and time visible emission was abated; and



FACILITY PERMIT TO OPERATE MCP FOODS INC

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

- 4). All visible emission observation records by operator or a certified smoke reader.

[RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997]

[Devices subject to this condition : D23, C26, C30, C31, C32, C33, C34, D43, D44, D45, D49, D50, D51, D53, C196]

- D328.1 The operator shall determine compliance with the CO emission limit(s) either: (a) conducting a source test at least once every five years using AQMD Method 100.1 or 10.1; or (b) conducting a test at least annually using a portable analyzer and AQMD-approved test method. The test shall be conducted when the equipment is operating under normal conditions to demonstrate compliance with 1146. The operator shall comply with all general testing, reporting, and recordkeeping requirements in Sections E and K of this permit.

[RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997]

[Devices subject to this condition : D27]

- D328.2 The operator shall determine compliance with the CO emission limit(s) either: (a) conducting a source test at least once every five years using AQMD Method 100.1 or 10.1; or (b) conducting a test at least annually using a portable analyzer and AQMD-approved test method. The test shall be conducted when the equipment is operating under normal conditions to demonstrate compliance with Rule 407. The operator shall comply with all general testing, reporting, and recordkeeping requirements in Sections E and K of this permit.

[RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997]

[Devices subject to this condition : C29]



FACILITY PERMIT TO OPERATE MCP FOODS INC

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

D328.3 The operator shall determine compliance with the NOX emission limit(s) either: (a) conducting a source test at least once every five years using AQMD Method 100.1 or 7.1; or (b) conducting a test at least annually using a portable analyzer and AQMD-approved test method. The test shall be conducted when the equipment is operating under normal conditions to demonstrate compliance with Rule 2012. The operator shall comply with all general testing, reporting, and recordkeeping requirements in Sections E and K of this permit.

[RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997]

[Devices subject to this condition : C29]

D328.4 The operator shall determine compliance with the NOX emission limit(s) either: (a) conducting a source test at least once every five years using AQMD Method 100.1 or 7.1; or (b) conducting a test at least annually using a portable analyzer and AQMD-approved test method. The test shall be conducted when the equipment is operating under normal conditions to demonstrate compliance with BACT. The operator shall comply with all general testing, reporting, and recordkeeping requirements in Sections E and K of this permit.

[RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997]

[Devices subject to this condition : D27]



FACILITY PERMIT TO OPERATE MCP FOODS INC

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

D381.1 The operator shall conduct an inspection for visible emissions from all stacks and other emission points of this equipment whenever there is a public complaint of visible emissions, whenever visible emissions are observed, and on a quarterly basis, at least, unless the equipment did not operate during the entire quarterly period. The routine quarterly inspection shall be conducted while the equipment is in operation and during daylight hours. If any visible emissions (not including condensed water vapor) are detected, the operator shall take corrective action(s) that eliminates the visible emissions within 24 hours and report the visible emissions as a potential deviation in accordance with the reporting requirements in Section K of this permit.

The operator shall keep the records in accordance with the recordkeeping requirements in Section K of this permit and the following records:

- 1). Stack or emission point identification;
- 2). Description of any corrective actions taken to abate visible emissions; and
- 3). Date and time visible emission was abated.

[RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997]

[Devices subject to this condition : C140]

E. Equipment Operation/Construction Requirements

E17.1 The operator shall not use more than 1 of the following items simultaneously:

Device ID: D47 [QUENCH TANK]

Device ID: D156 [QUENCH TANK]



FACILITY PERMIT TO OPERATE MCP FOODS INC

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

[Devices subject to this condition : D47, D156]

E102.1 The operator shall discharge dust collected in this equipment only into closed containers.

[**RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997**]

[Devices subject to this condition : C30, C31, C32, C33, C34, C140, C196]

E144.1 The operator shall vent this equipment, during filling, only to the vessel from which it is being filled.

[**RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002; RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997**]

[Devices subject to this condition : D4]

E149.1 The operator shall replace the scrubbing water with fresh water at least once every day.

[**RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002; RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997**]

[Devices subject to this condition : C26]

E193.1 The operator shall operate and maintain this equipment as follows:

The operator shall bleed periodically scrubbing water and replenish with fresh water to maintain operability of the scrubber.



FACILITY PERMIT TO OPERATE MCP FOODS INC

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002; RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997]

[Devices subject to this condition : C26]

E193.2 The operator shall operate and maintain this equipment as follows:

The operator shall use a nitrogen blanket to maintain the pressure greater than 1.5 inches water column.

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]

[Devices subject to this condition : D5]

H. Applicable Rules

H23.1 This equipment is subject to the applicable requirements of the following rules or regulations:

Contaminant	Rule	Rule/Subpart
Refrigerants	District Rule	1415

[RULE 1415, 10-14-1994]

[Devices subject to this condition : E18]

K. Record Keeping/Reporting

K67.1 The operator shall keep records, in a manner approved by the District, for the following parameter(s) or item(s):



FACILITY PERMIT TO OPERATE MCP FOODS INC

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

For architectural applications where no thinners, reducers, or other VOC containing materials are added, maintain semi-annual records for all coating consisting of (a) coating type, (b) VOC content as supplied in grams per liter (g/l) of materials for low-solids coatings, (c) VOC content as supplied in g/l of coating, less water and exempt solvent, for other coatings.

For architectural applications where thinners, reducers, or other VOC containing materials are added, maintain daily records for each coating consisting of (a) coating type, (b) VOC content as applied in grams per liter (g/l) of materials used for low-solids coatings, (c) VOC content as applied in g/l of coating, less water and exempt solvent, for other coatings.

[RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997]

[Devices subject to this condition : E17]

K67.2 The operator shall keep records, in a manner approved by the District, for the following parameter(s) or item(s):

material processed by Dryer D137

[RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997]

[Devices subject to this condition : D137]

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MCP Foods
ID 2825

EQUIPMENT DESCRIPTION

APPLICATION NOS. 446650, 51, 52, 53, 54, 55, 56, 57, 60, 61, 62, 63

Process 4, System 7

12 DRYING SYSTEMS (D167 – 190), RED LINE, EACH CONSISTING OF:

1. ROTARY DRUM DRYER, ABC SHEET METAL, STEAM HEATED, WITH A 2 HP DRIVE MOTOR
2. CYCLONE, DUST KOP, AGET MANUFACTURING, MODEL NO. 8N50-P, 1' D X 2' L.

APPLICATION NO. 507395

TITLE V/RECLAIM FACILITY MODIFICATION

BACKGROUND

Applications were received for existing equipment without permit (class III) July 6, 2005. A letter dated 11/18/09 requested 54 pounds of VOC offset for the above 12 dryers (57 pounds for the total project), and applicant's response dated 11/25/09 stated that the offsets would be provided within 90 days. The EPA 45 day notice was submitted 11/13/09. Applications were submitted 2/17/10 requesting a change of condition to reduce the production limit so as to reduce the required VOC ERC for the dryers to 34 pounds.

PROCESS DESCRIPTION

MCP Foods manufacturers flavorings used in beverages, sweet goods, dairy, oral care and nutrition products. The manufacturing process consists basically of syrup preparation, extrusion, size reduction, and drying.

The syrup is prepared by blending and heating sugar, water and various other ingredients. The syrup is pumped to an extrusion die, then dropped into a tank of chilled isopropyl alcohol where the syrup forms crystals. The crystal size is reduced by grinding in the IPA bath with a high speed agitator. The crystals are separated from the IPA, then dried, screened, and packaged.

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EMISSION ESTIMATES

Operating schedule: 16 hr/day, 6 days/week avg
24 hr/day, 7 day/week max

Batch size: 1100 lbs (wet)
880 lbs (finished product, dry*)

*Product is considered "dry" at a moisture content of 4% and an IPA content of 0.05%

Production limit: 208 batches/mo or 183, 040 lbs/mo, 12 dryers combined (finished product, dry)

PM emissions factors: 46 lb/T, uncontrolled
(AP-42, Table 8.4-1) 0.04 lb/T, controlled

VOC/IPA content: 132 lb/1100 lb batch, wet (12% wet)
0.44 lb/880 lb batch, dry (0.05 % dry)

Catalytic afterburner control efficiency: 97.6% capture
(source test dated 10/19/05) 99.3 % destruction
96.9 % overall

Typical batch takes almost 12 hours, so maximum daily will be assumed to be two batches per dryer
(2 batches/day)(132 lb VOC/batch) = 262 lb/day VOC/dryer, max, uncontrolled
(262)(1 - .969) = 8.12 lb/day VOC /dryer, max, controlled

(2 batches/day)(1100 lb/batch)(T/2000 lb)(46 lb/T) = 50.6 lb PM/dryer, max, uncontrolled
25.3 lb PM10 (standard 50% factor)

(2 batches/day)(1100 lb/batch)(T/2000 lb)(0.04 lb/T) = 0.0044 lb PM/PM10/dryer, max, controlled
(standard 100% PM10 assumed for controlled)

30 day average = (208 batches/mo)/30 = 6.933 batches/day (all 12 dryers)

(132 lb VOC/batch)(1 - .969)(6.933 batches/day, avg) = 28.37 lb/day, avg, controlled (12 dryers)
28.37 X 1.2 offset factor = 34 lb VOC ERC required

(1100 lb/batch)(T/2000 lb)(0.04 lb PM/T)(6.933 batches/day, avg) = 0.153 lb PM/day, avg, controlled
(12 dryers)

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RULE COMPLIANCE

Rule 212: Standards for approving permits

212(c)(1) Using the website geodistance.com, the closest schools, Abraham Lincoln Elementary and Thomas Jefferson Elementary, are more than 1000 feet from MCP's property line. A public notice is not required under this paragraph.

212(c)(2) Will not exceed the daily maximums specified in R212(g). A public notice is not required under this paragraph.

212(c)(3) Risk will be less than 1 in one million (see R1401 evaluation). A public notice is not required under this paragraph.

Rule 401 – Visible Emissions

Compliance is expected.

Rule 402- Nuisance

Compliance is expected.

Air Quality Modeling

Not required for VOC, PM below screening level

Emissions Offsets

Company has purchased 34 pounds of VOC ERCs

1401

Previous evaluation calculated acetaldehyde emissions for the entire facility (attached). Since records were not readily available to indicate which products processed in which equipment contained acetaldehyde, a worst case was assumed, with all the acetaldehyde for the entire facility emitted from the individual permit units. The drum dryers have the highest IPA emissions, so the drum dryers, with maximum assumed acetaldehyde, represent the worst case scenario. Passes Tier 2 screening risk assessment (attached).

Rule 3000 – Title V

De minimus significant permit revision. EPA review is required.

RECOMMENDATION

Reject the change of condition applications (system will not accept since the previous applications had not been issued), and make the requested changes under the original application numbers.

Compliance with all applicable rules and regulation are expected. A conditional permit to construct is recommended after required offsets are provided, and after EPA notice.

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MCP Foods
ID 2825

EQUIPMENT DESCRIPTION

APPLICATION NO. 510790

PROCESS 4, SYSTEM 9

CONTINUOUS FOOD FLAVORANTS LINE CONSISTING OF:

1. THREE BULK MATERIAL UNLOADING STATIONS, D43, D44 AND D45
2. STORAGE TANK, IPA, D46
3. CONVEYOR, D50
4. SCREW FEEDER, D51
5. CLASSIFYING SCREEN, D52
6. HOPPER, D53
7. TWO QUENCH TANKS, IPA, D156 AND D47
8. CENTRIFUGE, D48
9. DRYER, STEAM HEATED, D49
10. CYCLONE, D157

APPLICATION NO. 510791

TITLE V/RECLAIM FACILITY MODIFICATION

BACKGROUND

A/N 384079 P/C issued 12/7/01

New construction of the food flavorants line (renamed continuous line)
Concurrent facility modification by the over control of additional equipment
98% overall VOC control assumed in calculation (100% capture, 98% control)

A/N 446623 P/O no P/C issued 1/1/10 when moratorium was lifted

Modification by the addition of quench tank D156 (new) and cyclone D157 (part of the original submittal but not included on permit)

Considered as no increase in emission due to the added equipment. VOC emissions recalculated based on afterburner source test results which showed 96.9% overall control (97.6% capture, 99.3% control).

Added conditions limiting IPA usage to 46,304.5 lb/mo, and production to 250,000 lb/mo finished product.

A/N 510790 Request increasing the monthly limits to 83,348 lb IPA/mo and production to 450,000 lb/mo

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PROCESS DESCRIPTION

MCP Foods manufacturers flavorings used in beverages, sweet goods, dairy, oral care and nutrition products. The manufacturing process consists basically of syrup preparation, extrusion, size reduction, and drying.

The syrup is prepared by blending and heating sugar, water and various other ingredients. The syrup is pumped to an extrusion die, then dropped into a tank of chilled isopropyl alcohol where the syrup forms crystals. The crystal size is reduced by grinding in the IPA bath with a high speed agitator. The crystals are separated from the IPA, then dried, screened, and packaged.

EMISSION ESTIMATES

No change in maximum hourly or daily emissions expected with the increase in monthly limit

Operating schedule, average – 16 hr/day, 5 days/week

Operating schedule, max – 24 hr/day, 7 days/week

Syrup ingredients (dry) – 800 lb/hr

Flavor oils – 100 lb/hr

VOC control efficiency as tested – 96.9% overall

Maximum emissions as summarized from the previous evaluation (attached):

Pollutant	Uncontrolled lb/hr	Controlled lb/hr	Uncontrolled lb/day	Controlled lb/day
PM10	0.5975	0.00743	14.34	0.178
VOC	78.63	2.443	1887.18	58.64

Revised 30-day average based on requested monthly limits

800 + 100 = 900 lb/hr finished product

(450,000 lb/mo)/ 900 lb/hr = 500 hr/mo

(.00743 #PM10/hr)(500 hr/mo)/30 = 0.12383 lb PM10/day, 30-day average

(2.443 # VOC/hr)(500 hr/mo)/30 = 40.72 lb VOC/day, 30-day average

Or calculate directly from usage (ignoring estimated 0.15 #/day from storage which is uncontrolled)

Approximately 54% of the IPA is recovered as spent (flavored) IPA which is sold

(83,348 lb IPA/mo)(1 - .54)(1 - .969)/30 = 40 #VOC/day (use the slightly higher value calculated above)

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RULE COMPLIANCE

Rule 212: Standards for approving permits

212(c)(1) Using the website geodistance.com, the closest schools, Abraham Lincoln Elementary and Thomas Jefferson Elementary, are more than 1000 feet from MCP's property line. A public notice is not required under this paragraph.

212(c)(2) Maximum daily emissions are 58.64 pounds VOC/day, and 0.178 pounds PM10/day. Concurrent facility modification with a decrease in facility emissions. No increase in maximum daily emissions resulting from the increase in monthly limit. Increase in calculated average VOC emissions is (41 - 23) = 18 pounds per day (less than the threshold of 30 lb/day). A public notice is not required under this paragraph.

212(c)(3) Risk is below R1401 threshold. A public notice is not required under this paragraph.

Rule 401 - Visible Emissions

Compliance is expected.

Rule 402- Nuisance

Compliance is expected.

R 1131 - Food product manufacturing and processing operations

Per the rule definition of food product, flavorings are considered to be food products.

(c)(1)(B) requires 90% collection efficiency and 95% control by the control device. Source test indicated 97.6% capture and 99.3% control. Complies

New Source Review

BACT

Equipment is controlled by an afterburner and baghouses. Meets BACT requirements

Air Quality Modeling

PM emissions under the screening level of 0.41 pounds per hour. Not required for VOC.

Emissions Offsets

Company did not protest the conditioned limits within 30 days as specified in the rule. However, per discussion with management, it was agreed to recalculate emissions and consider as part of the concurrent facility modification.

Concurrent facility modification offset credit was given based on over control of some previously uncontrolled equipment. Afterburner as tested was 97.6% capture (90% required by R1131) and 99.3% control (95% required by R1131).

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From the previous evaluations, uncontrolled emissions from the existing, previously uncontrolled equipment was 3491 lb VOC/day

R1131 reduction requirement = $90 \times .95 = 85.5 \%$

Actual reduction as tested = $97.6 \times .993 = 96.9 \%$

Over control = $(3491)(.969 - .855) = 398$ lb VOC/day available as concurrent offset

Over time, the capture efficiency tends to decrease as the exhaust system develops leaks. Minimum overall control required to offset the continuous line can be calculated as follows:

Uncontrolled emissions from continuous line = 1887 #/day, max (excluding storage)

Emissions from storage (not vented to control) = 0.15 #/day, max

Uncontrolled emissions from concurrent facility mod equipment = 3491 #/day

Where C = minimum required overall control efficiency

$$0.15 + (1887)(1 - C) = (3491)(C - .855)$$

Minimum required overall control efficiency = .9057 (90.57 %)

vs. 96.6 % overall control as tested – continued compliance is expected

The additional quench tank (D156), which was added later, is not included under the concurrent facility modification. There is no increase in IPA usage associated with the additional quench tank. It is used only at the start up of a product run, instead of the primary quench tank. Add a condition to prohibit concurrent operation of the two quench tanks.

The start-up material is not up to client specifications, and is not completely processed. It is collected in a separate hopper and discarded. Since the material is not fully processed, it is not “finished product” which is limited by permit condition. Change the condition wording to “product” instead of “finished product”, and specify that it includes discarded or off spec material.

R 1401

Maximum emissions are 2.443 pounds of VOC (IPA) per hour. Passes Tier 1 risk assessment, attached.

Some products also contain acetaldehyde. A prior evaluation calculated acetaldehyde emissions for the entire facility. Since records were not readily available to indicate which products processed in which equipment contained acetaldehyde, a worst case was assumed, with all the acetaldehyde for the entire facility emitted from the individual permit unit. Passed Tier 2 screening risk assessment.

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Rule 3000 – Title V

Initial Title V issued 7/30/04. Title V renewal was submitted for EPA review 11/13/09, and public notice was published 11/23/09. But renewal has not been issued yet – awaiting ERCs on a modification that was sent to EPA in the same package.

Increase in VOC emissions from the increase in production and IPA limits:

41 -23 = 18 #/day (less than the threshold of 30 pounds per day for Title V public notice)

45-day EPA notice is required.

RECOMMENDATION

Compliance with all applicable rules and regulation are expected. A conditional permit to operate is recommended after EPA notice.

TIER 1 SCREENING RISK ASSESSMENT REPORT

Receptor Distance (actual)	75
Receptor Distance (for X/Q LOOKUP)	50

Tier 1 Results	
Cancer/Chronic ASI	Acute ASI
3.51E-02	7.63E-01
PASSED	PASSED

APPLICATION SCREENING INDEX CALCULATION

Compound	Average Annual Emission Rate	Max Hourly Emission Rate (lbs/hr)	Cancer / Chronic Pollutant Screening Level (lbs/yr)	Acute Pollutant Screening Level (lbs/hr)	Cancer / Chronic Pollutant Screening Index	Acute Pollutant Screening Index (PSI)
Isopropyl alcohol	2.13E+04	2.44E+00	6.07E+05	3.20E+00	3.51E-02	7.63E-01

TOTAL (APPLICATION SCREENING INDEX)

3.51E-02 7.63E-01

Previous A/N 446623 - Continuous Line

Operating Schedule - 16 hrs/day, 5 day/wk, 51 wks/yr (Average)
 - 24 hrs/day, 7 days/wk, 52 wks/yr (Max)

Monthly Production - 277.75 hrs (Maximum)
 Syrup Ingredients (Dry) - 800 lb/hr (222,200 lb/mo)
 Flavor Oils - 100 lb/hr (27,775 lb/mo)
 IPA - 46,304.5 lb/mo

PM₁₀ - 0.5 PM emissions, District Default, assumed to be an overestimation. Moisture content of product before the dryer is ~8%. Moisture content of product after the dryer is ~4%. IPA content of product before the dryer is ~12% and 0.05% after the dryer. PM emission factors in use are for product with a moisture content typically <3% and no solvent content.

PM emission factors for Continuous Line

Process Step	Emission Factor Lb/ton	Ap-42 Process
Bulk bag unloading	2.0	6.7-1
Conveyer transfer	0.26	9.10.1.1-6
Dryer	0.26	9.10.1.1-6
Screening (PM ₁₀)	0.0087	11.19.2-8
Packaging	0.19	8.2-4

PM₁₀ emissions for Continuous Line

Process	Eff [†] %	R1 Lb/hr	R2 Lb/hr	R1 Lb/day	R2 Lb/day	30-Day*
Bulk bag transfer [†]	99	0.4	0.004	9.6	0.096	0.037
Conveyer transfer	98	0.052	0.00104	1.248	0.025	0.01
Dryer [†]	99	0.052	0.00052	1.248	0.0125	0.005
Conveyer transfer	98	0.052	0.00104	1.248	0.025	0.01
Screening	98	0.00348	0.00007	0.08352	0.00167	0.001
Packaging	98	0.038	0.00076	0.912	0.01824	0.007
PM ₁₀ Total		0.5975	0.00743	14.34	0.178	0

* 30-Day emissions based on monthly production limits

† Capture efficiency is 100%, all others @ 99%

* Efficiency of control is >99%

Process Step	Emission Factor* Lb/hr	Equation Process
Centrifuge - IPA	0.576	Ideal Gas Law/Dalton's Law
Dryer - IPA	67.66	Mass balance
Trace - Organics	10.39	Flow rate
Storage - IPA	0.0063	Tanks 4.0

*VOC emission factors for Continuous Line are taken from the Permit to Construct evaluation for A/N 384079.

VOC emission with 96.9% control

Process	R1 Lb/hr	R2 Lb/hr	R1 Lb/day	R2 Lb/day	30-Day*
Centrifuge	0.5763	0.0179	13.831	0.429	0.165
Dryer	67.66	2.097	1623.84	50.33	19.415
Storage	0.0063	0.0063	0.15	0.15	0.058
Trace	10.39	0.3221	249.36	7.73	2.982
Total	78.63	2.443	1887.18	58.64	22.62 (23)

* 30-Day emissions based on monthly production limit of 250000 lbs of finished product.