



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
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May 8, 2015

Mr. Gerardo Rios
Chief – Permit Office
US EPA, Region IX Air 3
75 Hawthorne Street
San Francisco, CA 94105

**Subject: Clougherty Packing, LLC - I.D. No. 16978, Title V/RECLAIM Permit
Modification**

Dear Mr. Rios:

Clougherty Packing, LLC located at 3049 E. Vernon Avenue in the City of Vernon, CA has proposed to revise their Title V/RECLAIM Facility Permit by changing permit conditions on three smoke generators. The proposed permit revision is considered a “minor permit revision” to their Title V Permit. Enclosed for your review is draft Facility Permit Section H of the proposed permit revision. With your expected receipt of the proposed Title V permit revision on May 8, 2015, we will note that the EPA 45-day period will begin on that date.

If you have any questions concerning the proposed Title V permit revision, please contact Erwin dela Cruz, Air Quality Engineer, at (909)396-2528 or you may contact him by email at edelacruz@aqmd.gov.

Sincerely,

Mohan Balagopalan
Senior Engineering Manager
Chemical, Mechanical, and Ports Permitting

MB:SE:ed

Enclosures:
Proposed Title V Permit Revision



FACILITY PERMIT TO OPERATE CLOUGHERTY PACKING LLC/HORMEL FOODS CORP

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

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 2: ANIMAL/POULTRY RENDERING					
System 7: Meat Smoking					
SMOKE GENERATOR, NO. 1A, SCHROTER, MODEL SMOKJET RH, 0.8 KW A/N: 571736 Permit to Construct Issued: 04/22/15	D181	D75 D76		PM: (9) [RULE 405, 2-7-1986]	B163.1, C1.29, C1.30, D28.2, D323.1, K40.2
SMOKE GENERATOR, NO. 2, SCHROTER, MODEL SMOKJET RH, 0.8 KW A/N: 572001 Permit to Construct Issued: 04/22/15	D196	D77 D78		PM: (9) [RULE 405, 2-7-1986]	B163.1, C1.29, C1.30, D28.2, D323.1, K40.2
SMOKE GENERATOR, NO. 3, SCHROTER, MODEL SMOKJET RH, 0.8 KW A/N: 572032 Permit to Construct Issued: 04/22/15	D197	D79 D80		PM: (9) [RULE 405, 2-7-1986]	B163.1, C1.29, C1.30, D28.2, D323.1, K40.2

- * (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

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



**FACILITY PERMIT TO OPERATE
CLOUGHERTY PACKING LLC/HORMEL FOODS CORP**

SECTION H: 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
CLOUGHERTY PACKING LLC/HORMEL FOODS CORP**

SECTION H: DEVICE ID INDEX

Device Index For Section H			
Device ID	Section H Page No.	Process	System
D181	1	2	7
D196	1	2	7
D197	1	2	7



FACILITY PERMIT TO OPERATE CLOUGHERTY PACKING LLC/HORMEL FOODS CORP

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

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

FACILITY CONDITIONS

F9.1 Except for open abrasive blasting operations, the operator shall not discharge into the atmosphere from any single source of emissions whatsoever any air contaminant for a period or periods aggregating more than three minutes in any one hour which is:

(a) As dark or darker in shade as that designated No.1 on the Ringelmann Chart, as published by the United States Bureau of Mines; or

(b) Of such opacity as to obscure an observer's view to a degree equal to or greater than does smoke described in subparagraph (a) of this condition.

[RULE 401, 3-2-1984; RULE 401, 11-9-2001]

F14.2 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]

SYSTEM CONDITIONS

S1.1 The operator shall limit the throughput to no more than 600,000 lb(s) in any one day.

For the purpose of this condition, throughput shall be defined as the maximum throughput of raw materials processed in this rendering plant.

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

[Systems subject to this condition : Process 2, System 1 , 2 , 3]

S1.2 The operator shall limit the material processed to no more than 180,000 lb(s) in any one day.

For the purpose of this condition, material processed shall be defined as the total quantity of meat and bone meal processed in this rendering plant.



FACILITY PERMIT TO OPERATE CLOUGHERTY PACKING LLC/HORMEL FOODS CORP

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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]

[Systems subject to this condition : Process 2, System 3]

- S1.3 The operator shall limit the material processed to no more than 144,000 lb(s) in any one day.

For the purpose of this condition, material processed shall be defined as the total quantity of cooked grease processed in this rendering plant. Cooked grease does not include brown grease produced by the wastewater treatment system.

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

[Systems subject to this condition : Process 2, System 2 , 4]

DEVICE CONDITIONS

B. Material/Fuel Type Limits

- B163.1 The operator shall not use wood containing the following:

Chemical treatments or chemical bonding compounds

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

[Devices subject to this condition : D181, D196, D197]

C. Throughput or Operating Parameter Limits

- C1.29 The operator shall limit the material processed to no more than 12,000 lbs in any one calendar month.

For the purpose of this condition, material processed shall be defined as wood chips.



FACILITY PERMIT TO OPERATE CLOUGHERTY PACKING LLC/HORMEL FOODS CORP

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

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 : D181, D196, D197]

C1.30 The operator shall limit the material processed to no more than 6,000 lbs in any one calendar month.

For the purpose of this condition, material processed shall be defined as corn cobs.

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

[Devices subject to this condition : D181, D196, D197]

D. Monitoring/Testing Requirements

D28.2 The operator shall conduct source test(s) in accordance with the following specifications:

The test shall be conducted to determine the PM10 emissions at the inlet of "connected to" APC and at the outlet simultaneously.

The test shall be conducted to determine the VOC emissions at the inlet of "connected to" APC and at the outlet simultaneously.

Source test shall be conducted when this equipment is using corn cobs.

The District shall be notified of the date and time of the test at least 14 days prior to the test.

The test shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up.

The test shall be conducted after a source test protocol has been submitted and approved.

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



FACILITY PERMIT TO OPERATE CLOUGHERTY PACKING LLC/HORMEL FOODS CORP

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

[Devices subject to this condition : D181, D196, D197]

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 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.

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.



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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 : D181, D196, D197]

K. Record Keeping/Reporting

K40.2 The operator shall provide to the District a source test report in accordance with the following specifications:

Source test results shall be submitted to the District no later than 60 days after the source test was conducted.

Emission data shall be expressed in terms of mass rate (lbs/hr). In addition, solid PM emissions, if required to be tested, shall also be reported in terms of grains per DSCF.

Source test results shall also include production rate under which the test was conducted.

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

[Devices subject to this condition : D181, D196, D197]