

Air Permit Review

Region: Fayetteville Regional Office
County: Anson
NC Facility ID: 0400034
Inspector's Name: Robert Hayden
Date of Last Inspection: 01/18/2011
Compliance Code: 3 / Compliance - inspection

Permit Issue Date:

Facility Data			Permit Applicability (this application only)
Applicant (Facility's Name): Valley Protein Inc - Wadesboro Div Facility Address: Valley Protein Inc - Wadesboro Div Little Duncan Road Wadesboro, NC 28170 SIC: 2077 / Animal And Marine Fats And Oil NAICS: 311613 / Rendering and Meat Byproduct Processing Facility Classification: Before: Title V After: Title V Fee Classification: Before: Title V After: Title V			SIP: NSPS: NESHAP: PSD: PSD Avoidance: NC Toxics: 112(r): Other:
Contact Data			Application Data
Facility Contact	Authorized Contact	Technical Contact	Application Number: 0400034.10A Date Received: 04/28/2010 Application Type: Renewal Application Schedule: TV-Renewal Existing Permit Data Existing Permit Number: 06467/T17 Existing Permit Issue Date: 08/07/2009 Existing Permit Expiration Date: 01/31/2011
Dean Deibert General Manager (704) 694-3701 Little Duncan Road Wadesboro, NC 28170	Dean Deibert General Manager (704) 694-3701 Little Duncan Road Wadesboro, NC 28170	Van Jones Environmental Manager (704) 864-9941 5533 South York Road Gastonia, NC 28052	
Review Engineer: Jenny Sheppard Review Engineer's Signature: _____ Date: _____		Comments / Recommendations: Issue 06467/T18 Permit Issue Date: Permit Expiration Date:	

I. Purpose of Application

This permitting action is a renewal of an existing Title V permit pursuant to 2Q .0513. The existing Title V permit (06467T17) was issued on September 29, 2010, and is currently scheduled to expire on July 30, 2011. The renewal application was received on September 29, 2008 and deemed complete November 28, 2008 with an update on September 14, 2010 which included the new scrubbing medium addition. Since the renewal application was received at least nine months prior to the expiration date, the existing permit shall not expire until the renewal permit has been issued or denied. All terms and conditions of the existing permit shall remain in effect until the renewal permit has been issued or denied.

II. Facility Description

Valley Proteins, Inc. – Wadesboro Division renders chicken feathers, blood, fat and organs for a number of processors. They use several rendering methods to make four products: feather meal, pet-food-grade protein meal, feed-grade meal (poultry food additive), and fat. The majority of the fat is sold as a feed additive but can also be used as boiler fuel when fuel prices warrant. There are four uncontrolled boilers that supply steam to

the processes. The primary control for the rendering emission is the evaporation of condensables, then oxidation within the boilers.

III. History/Background/Application Chronology

February 16, 2006 – Title V renewal permit 06467T12 issued by Wallace Pitts.

June 29, 2006 – Administrative amendment to correct stack testing extension complete date permit 06467T13 issued by Betty Gattano

December 4, 2006 – Minor modification to add No. 2 fuel oil to boilers B-1 and B-2 permit 06467T14 issued by Kevin Godwin

April 1, 2008 – Minor modification to add rendering sources permit 06467T15 issued by Jenny Kelvington

November 20, 2008 – Minor modification to add temporary boiler B-5 permit 06467T16 issued by Jenny Sheppard

August 7, 2009 – Minor modification to add ActXone as an alternative to chlorine dioxide in C4 and C8 permit 06467T17 issued by Mike Gordon

IV. Permit Modification/Changes

Table of changes to permit 06467T18

Page(s)	Section	Description of Change(s)
Cover letter		Update permit revision number and issue date
1		Update permit revision number and issue date, application number
3	Section 1	Edit permit number in page header
7	Section 2.1	Starting in Section 2.1 A through 2.2 A updating all testing conditions to current language
29	Section 3	Updated to current language

V. Regulatory Review

The facility is subject to the following regulations:

- 15A NCAC 2D .0503, Particulates from Fuel Burning Indirect Heat Exchangers
- 15A NCAC 2D .0515, Particulates from Miscellaneous Industrial Processes
- 15A NCAC 2D .0516, Sulfur Dioxide Emissions from Combustion Sources
- 15A NCAC 2D .0521, Control of Visible Emissions
- 15A NCAC 2D .0524, NSPS 40 CFR Part 60 Subpart Dc
- 15A NCAC 2D .0539, Odor Control of Feed Ingredient Manufacturing Plants(*State-Enforceable Only*)
- 15A NCAC 2D .1100, Control of Toxic Air Pollutants (*State-Enforceable Only*)
- 15A NCAC 2Q .0317, Avoidance Conditions (PSD Avoidance)

No new or additional requirements have been added to this renewed permit. Therefore, a regulatory review will not be included in this document.

VI. NSPS, NESHAPS, PSD, Attainment Status, 112(r), CAM

NSPS

The facility (**actually existing boiler (ID No. B-3)**) is currently subject to New Source Performance Standard (NSPS) Subpart Dc. Fuel oil supplier certifications meet this requirement. This renewal application does not add any new requirements.

NESHAP/MACT

The facility is currently not subject to any NESHAP or MACT and not major for HAPs.

PSD

This facility is currently minor for PSD purposes and currently operates under two separate PSD avoidance conditions. The boilers (**ID Nos. B-1, B-2, B-3, B-4, and B-5**) are limited to less than 250 tons of sulfur dioxide per year and to less than 250 tons of carbon monoxide per year. Continued compliance is expected. Semiannual reporting of the monthly calculations is now allowed.

Attainment Status

This facility is located in Anson County, which is currently in attainment according to 2D .0902.

112(r)

This facility is not subject to Section 112(r) of the Clean Air Act requirements because it does not store any of the regulated substances in quantities above the thresholds in the Rule.

CAM

40 CFR 64 requires that a continuous assurance monitoring plan be developed for all equipment located at a major facility that have pre-controlled emissions above the major source threshold and use a control device to meet an applicable standard. Most of the process equipment (e.g. meat material process, press/centrifuge process, etc.) is primarily controlled by scrubbers, thermal oxidizers and/or biofilter for the reduction of odor. The facility has evaluated each source for CAM applicability and has determined that the sources either do not have a control device to meet compliance with an emission limit or a standard for a federally regulated pollutant or the sources have uncontrolled potential emission of less than 100 tons. Therefore, CAM does not apply to this facility at this time.

VII. Facility-wide Air Toxics

The current permit contains an avoidance condition for 2D .1100, Control of Toxic Air Pollutants regulations because On Spec recycled No. 4 equivalent fuel oil that may be fired in boilers (**ID Nos. B-1, B-2, B-4, and B-5**). There is no change required for this renewal.

VIII. Statement of Compliance

The DAQ has reviewed the compliance status of this facility. Based on visual observations and review of records at the time of the inspection, this facility appeared to be operating in compliance with Air Quality standards and regulations.

IX. Facility Emissions Review

There is no change in emissions for this renewal. The following table represents facility-wide actual emissions as submitted by the facility in its latest emissions inventory:

Pollutant	2009 Emissions (tons per year)
Particulate Matter less than 10 microns	4.21
Carbon Monoxide	12.51

Nitrogen Oxides	32.72
Sulfur Dioxide	1.36
Volatile Organic Compounds	12.79
(all other HAPs/TAPs)	< 1 ton

X. Stipulation Review

The permit modification/changes (where needed) were incorporated into the permit (see table of changes in Section IV of this document).

XI. Public Notice / EPA and Affected State Review

A notice of the draft Title V Permit was placed on the DAQ website. The notice provided for a 30-day comment period, with an opportunity for a public hearing. Copies of the public notice were sent to persons on the Title V mailing list and EPA. *To be completed after comment period.*

Pursuant to 2Q .0522, a copy of each permit application, each proposed permit and each final permit pursuant shall be provided to EPA. *To be completed after comment period.* Also pursuant to 2Q .0522, a notice of the draft Title V Permit was provided to each affected State at or before the time notice provided to the public. South Carolina, Mecklenburg County and the Catawba Indian Nation are considered to be affected States for this facility.

XII. Conclusions, Comments, and Recommendations

1. A professional engineer's seal was not required for this renewal.
2. A consistency determination was not required for this renewal.
3. FRO recommends issuance of the permit and does request a DRAFT permit prior to issuance.
4. RCO concurs with FRO's recommendation to issue air permit.
5. Comments received on DRAFT/PROPOSED permit:
6. *To be completed at after the comment period has ended*