

**AIR EMISSION PERMIT NO. 09900002- 004  
IS ISSUED TO**

Hormel Foods Corporation  
Quality Pork Processors (QPP)

**Hormel Foods Corp - Austin**  
500 14th Avenue Northeast  
Austin, Mower County, MN 55912

The emission units, control equipment and emission stacks at the stationary source authorized in this permit are as described in the following permit application(s):

Permit Type	Application Date
Total Facility Operating Permit	January 1995
Minor Amendment	July 1999
Moderate Amendment	February 2000
Major Amendment	March 2001

This permit authorizes the permittee to operate and modify the stationary source at the address listed above unless otherwise noted in Table A. The permittee must comply with all the conditions of the permit. Any changes or modifications to the stationary source must be performed in compliance with Minn. R. 7007.1150 to 7007.1500. Terms used in the permit as defined in the state air pollution control rules unless the term is explicitly defined in the permit.

**Permit Type:** Federal ; Syn Min PSD/NSR

**Issue Date:** February 12, 2002

**Expiration:** August 5, 2004

All Title I Conditions do not expire.

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Ann Foss, Manager  
Majors and Remediation Division

for Karen A. Studders, Commissioner  
Minnesota Pollution Control Agency

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**NOTICE TO THE PERMITTEE:**

Your stationary source may be subject to the requirements of the Minnesota Pollution Control Agency's (MPCA) solid waste, hazardous waste, and water quality programs. If you wish to obtain information on these programs, including information on obtaining any required permits, please contact the MPCA general information number at:

Metro Area	(651) 296-6300
Outside Metro Area	1-800-657-3864
TTY	(651) 282-5332

The rules governing these programs are contained in Minn. R. chs. 7000-7105. Written questions may be sent to: Minnesota Pollution Control Agency, 520 Lafayette Road North, St. Paul, Minnesota 55155-4194.

Questions about this air emission permit or about air quality requirements can also be directed to the telephone numbers and address listed above.

**PERMIT SHIELD:**

Subject to the limitations in Minn. R. 7007.1800, compliance with the conditions of this permit shall be deemed compliance with the specific provision of the applicable requirement identified in the permit as the basis of each condition. Subject to the limitations of Minn. R. 7007.1800 and 7017.0100, subp. 2, notwithstanding the conditions of this permit specifying compliance practices for applicable requirements, any person (including the Permittee) may also use other credible evidence to establish compliance or noncompliance with applicable requirements.

**MODIFICATION DESCRIPTION:**

This permit amendment authorizes the permittee to modify seven existing boilers to facilitate combustion of refined animal fats (RAF). Five of the boilers were previously permitted to combust No. 6 fuel oil, used oil, and natural gas. The remaining two boilers were permitted for only natural gas combustion. Due to the emission characteristics of RAF, a new NO<sub>x</sub> limit is applied to the entire group of boilers to maintain the facility's classification as nonmajor relative to the Prevention of Significant Deterioration (PSD) portion of New Source Review (NSR). Likewise, the existing SO<sub>2</sub> limit, that applied only to the five boilers previously capable of combusting fuels other than natural gas, now applies to the entire group of seven boilers.

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

02/12/02

Facility Name: Hormel Foods Corp - Austin

Permit Number: 09900002 - 004

**Table A contains limits and other requirements with which your facility must comply. The limits are located in the first column of the table (What To do). The limits can be emission limits or operational limits. This column also contains the actions that you must take and the records you must keep to show that you are complying with the limits. The second column of Table A (Why to do it) lists the regulatory basis for these limits. Appendices included as conditions of your permit are listed in Table A under total facility requirements.**

**Subject Item:****Total Facility**

<b>What to do</b>	<b>Why to do it</b>
Performance Testing: Conduct all performance tests in accordance with Minn. R. ch. 7017 unless otherwise noted in Tables A, B, and/or C.	Minn. R. ch. 7017
Limits set as a result of a performance test (conducted before or after permit issuance) apply until superseded as specified by Minn. R. 7017.2025 following formal review of a subsequent performance test on the same unit.	Minn. R. 7017.2025
Performance Test Notifications and Submittals:  Performance Tests are due as outlined in Tables A and B of the permit. See Table B for additional testing requirements.  Performance Test Notification (written): due 30 days before each Performance Test Performance Test Plan: due 30 days before each Performance Test Performance Test Pre-test Meeting: due 7 days before each Performance Test Performance Test Report: due 45 days after each Performance Test Performance Test Report - Microfiche Copy: due 105 days after each Performance Test	Minn. R. 7017.2030, subp. 1-4 and Minn. R. 7017.2035, subp. 1-2.
Monitoring Equipment: Install or make needed repairs to monitoring equipment within 60 days of issuance of the permit if monitoring equipment is not installed and operational on the date the permit is issued.	Minn. R. 7007.0800, subp. 4(D)
Monitoring Equipment Calibration: Annually calibrate all required monitoring equipment (any requirements applying to continuous emission monitors are listed separately in this permit).	Minn. R. 7007.0800, subp. 4(D)
Operation of Monitoring Equipment: Unless otherwise noted in Tables A, B, and/or C, monitoring a process or control equipment connected to that process is not necessary during periods when the process is shutdown, or during checks of the monitoring systems, such as calibration checks and zero and span adjustments. If monitoring records are required, they should reflect any such periods of process shutdown or checks of the monitoring system.	Minn. R. 7007.0800, subp. 4(D)
Circumvention: Do not install or use a device or means that conceals or dilutes emissions, which would otherwise violate a federal or state air pollution control rule, without reducing the total amount of pollutant emitted.	Minn. R. 7011.0020
Shutdown Notifications: Notify the Commissioner at least 24 hours in advance of a planned shutdown of any control equipment or process equipment if the shutdown would cause any increase in the emissions of any regulated air pollutant. If the owner or operator does not have advance knowledge of the shutdown, notification shall be made to the Commissioner as soon as possible after the shutdown. However, notification is not required in the circumstances outlined in Items A, B and C of Minn. R. 7019.1000, subp. 3.  At the time of notification, the owner or operator shall inform the Commissioner of the cause of the shutdown and the estimated duration. The owner or operator shall notify the Commissioner when the shutdown is over.	Minn. R. 7019.1000, subp. 3
Breakdown Notifications: Notify the Commissioner within 24 hours of a breakdown of more than one hour duration of any control equipment or process equipment if the breakdown causes any increase in the emissions of any regulated air pollutant. The 24-hour time period starts when the breakdown was discovered or reasonably should have been discovered by the owner or operator. However, notification is not required in the circumstances outlined in Items A, B and C of Minn. R. 7019.1000, subp. 2.  At the time of notification or as soon as possible thereafter, the owner or operator shall inform the Commissioner of the cause of the breakdown and the estimated duration. The owner or operator shall notify the Commissioner when the breakdown is over.	Minn. R. 7019.1000, subp. 2
Notification of Deviations Endangering Human Health or the Environment: As soon as possible after discovery, notify the Commissioner or the state duty officer, either orally or by facsimile, of any deviation from permit conditions which could endanger human health or the environment.	Minn. R. 7019.1000, subp. 1

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

02/12/02

Facility Name: Hormel Foods Corp - Austin

Permit Number: 09900002 - 004

Notification of Deviations Endangering Human Health or the Environment Report: Within 2 working days of discovery, notify the Commissioner in writing of any deviation from permit conditions which could endanger human health or the environment. Include the following information in this written description: 1. the cause of the deviation; 2. the exact dates of the period of the deviation, if the deviation has been corrected; 3. whether or not the deviation has been corrected; 4. the anticipated time by which the deviation is expected to be corrected, if not yet corrected; and 5. steps taken or planned to reduce, eliminate, and prevent reoccurrence of the deviation.	Minn. R. 7019.1000, subp. 1
Operation Changes: In any shutdown, breakdown, or deviation the Permittee shall immediately take all practical steps to modify operations to reduce the emission of any regulated air pollutant. The Commissioner may require feasible and practical modifications in the operation to reduce emissions of air pollutants. No emissions units that have an unreasonable shutdown or breakdown frequency of process or control equipment shall be permitted to operate.	Minn. R. 7019.1000, subp. 4
Air Pollution Control Equipment: Operate all pollution control equipment whenever the corresponding process equipment and emission units are operated, unless otherwise noted in Table A.	Minn. R. 7007.0800, subp. 2; Minn. R. 7007.0800, subp. 16(J)
Fugitive Emissions: Do not cause or permit the handling, use, transporting, or storage of any material in a manner which may allow avoidable amounts of particulate matter to become airborne. Comply with all other requirements listed in Minn. R. 7011.0150.	Minn. R. 7011.0150
Application for Permit Amendment: If a permit amendment is needed, submit an application in accordance with the requirements of Minn. R. 7007.1150 through Minn. R. 7007.1500. Submittal dates vary, depending on the type of amendment needed.	Minn. R. 7007.1150 through Minn. R. 7007.1500
Extension Requests: The Permittee may apply for an Administrative Amendment to extend a deadline in a permit by no more than 120 days, provided the proposed deadline extension meets the requirements of Minn. R. 7007.1400, subp. 1(H).	Minn. R. 7007.1400, subp. 1(H)
Record keeping: Maintain records describing any insignificant modifications (as required by Minn. R. 7007. 1250, subp. 3) or changes contravening permit terms (as required by Minn. R. 7007.1350 subp. 2), including records of the emissions resulting from those changes.	Minn. R. 7007.0800, subp. 5(B)
Record keeping: Retain all records at the stationary source for a period of five (5) years from the date of monitoring, sample, measurement, or report. Records which must be retained at this location include all calibration and maintenance records, all original recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. Records must conform to the requirements listed in Minn. R. 7007.0800, subp. 5(A).	Minn. R. 7007.0800, subp. 5(C)
Noise: The Permittee shall comply with the noise standards set forth in Minn. R. 7030.0010 to 7030.0080 at all times during the operation of any emission units. This is a state only requirement and is not federally enforceable.	Minn. R. 7030.0010 - 7030.0080
The Permittee shall comply with the General Conditions listed in Minn. R. 7007.0800, subp. 16.	Minn. R. 7007.0800, subp. 16
Inspections: Upon presentation of credentials and other documents as may be required by law, allow the Agency, or its representative, to enter the Permittee's premises to have access to and copy any records required by this permit, to inspect at reasonable times (which include any time the source is operating) any facilities, equipment, practices or operations, and to sample or monitor any substances or parameters at any location.	Minn. R. 7007.0800, subp. 9(A)
Emission Fees: due 60 days after receipt of an MPCA bill.	Minn. R. 7002.0005 through Minn. R. 7002.0095
Computer Dispersion Modeling for Information: due within 1096 days of permit issuance. Submit modeling data as specified in MPCA guidance for Modeling Information Requests (for pollutant). This modeling information is for data collection purposes, no modeling analysis is required at this time. This is a state only requirement and is not enforceable by the EPA Administrator or citizens under the Clean Air Act.	Minn. R. 7007.0800, subp. 2

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

02/12/02

Facility Name: Hormel Foods Corp - Austin

Permit Number: 09900002 - 004

**Subject Item:** GP 001 Boilers (49, 49, 49, 25 & 7.14 MMBtu/hr)**Associated Items:** EU 001 Gas/Oil Fired Boiler

EU 002 Gas/Oil Fired Boiler

EU 003 Gas/Oil Fired Boiler

EU 004 Gas/Oil Fired Boiler

EU 005 Gas/Oil Fired Boiler

SV 001 Boiler Stack

What to do	Why to do it
EMISSION LIMITS	hdr
Total Particulate Matter: less than or equal to 0.4 lbs/million Btu heat input (applies individually to each boiler).	Minn. R. 7011.0515, subp. 1
Opacity: less than or equal to 20 percent opacity except for one six-minute period per hour of not more than 60 percent opacity.	Minn. R. 7011.0515, subp. 2
Sulfur Dioxide: less than or equal to 2.0 lbs/million Btu heat input ( 1.89% percent sulfur)	Minn. R. 7011.0510, subp. 1
OPERATING LIMITS	hdr
Fuel Allowed: limited to natural gas, No. 6 fuel oil, used oil, and refined animal fats	Minn. R. 7007.0800, subp. 2
The used oil combusted in EU 001 through EU 005 shall be used oil which is defined as any oil which has been used and as a result of such use has become contaminated by physical or chemical impurities. The used oil shall not contain any hazardous waste listed in Minn. R. 7045.0135. The used oil must be on-specification and meet the following restrictions: 1) Total Arsenic not to exceed 5 ppm 2) Total Cadmium not to exceed 2 ppm 3) Total Chromium not to exceed 10 ppm 4) Total Lead not to exceed 100 ppm 5) Flash point not less than 100 degrees F 6) Total Halogens not to exceed 1,000 ppm The Permittee must obtain and keep on-site for at least five years a laboratory analysis demonstrating that the used oil is on-specification.	Minn. R. 7007.0800, subp. 2
Fuel Usage: less than or equal to 15000 gallons/year using 12-month Rolling Sum of used oil as a total in all boilers.	Minn. R. 7007.0800, subp. 2
Limit boiler operation to a level at or below that of the most recent particulate matter performance test that measured emissions at or below the applicable particulate matter emission limit.	Minn. R. 7007.0800, subp. 2

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

02/12/02

Facility Name: Hormel Foods Corp - Austin

Permit Number: 09900002 - 004

**Subject Item: GP 003 Natural Smoke Process**

**Associated Items:**

- EU 006 Smoked Meat Oven #6 with recirculated wood smoke
- EU 007 Smoked Meat Oven #7 with recirculated wood smoke
- EU 008 Smoked Meat Oven #8 with recirculated wood smoke
- EU 009 Smoked Meat Oven #9 with recirculated wood smoke
- EU 010 Smoked Meat Oven #10 with recirculated wood smoke
- EU 031 Natural Smoke Generator
- EU 032 Natural Smoke Generator
- SV 002 Natural Smoke Meat Oven (For EU006)
- SV 003 Natural Smoke Meat Oven (Bypass for SV002)
- SV 004 Natural Smoke Meat Oven (For EU007)
- SV 005 Natural Smoke Meat Oven (Bypass for SV004)
- SV 006 Natural Smoke Meat Oven (For EU008)
- SV 007 Natural Smoke Meat Oven (Bypass for SV006)
- SV 008 Natural Smoke Meat Oven (For EU009)
- SV 009 Natural Smoke Meat Oven (Bypass for SV008)
- SV 010 Natural Smoke Meat Oven (For EU0010)
- SV 011 Natural Smoke Meat Oven (Bypass for SV010)

What to do	Why to do it
EMISSION LIMITS	hdr
Total Particulate Matter: less than 0.30 grains/dry standard cubic foot unless required to reduce emissions to meet the less stringent limit of either 7011.0730 or 7011.0735 (table 1 and 2, respectively).	Minn. R. 7011.0715, subp. 1(A)
Opacity: less than or equal to 20 percent	Minn. R. 7011.0715, subp. 1(B)
PERFORMANCE TESTING REQUIREMENTS	hdr
Performance Test: due 180 days after permit issuance for Total Particulate Matter and Opacity.	Minn. R. 7017.2020, subp. 1

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

02/12/02

Facility Name: Hormel Foods Corp - Austin

Permit Number: 09900002 - 004

**Subject Item: GP 005 Precook Bacon Process**

**Associated Items:** CE 006 Mist Eliminator - High Velocity, i.e., V>250 Ft/Min  
 CE 007 Mist Eliminator - High Velocity, i.e., V>250 Ft/Min  
 CE 011 Mist Eliminator - High Velocity, i.e., V>250 Ft/Min  
 EU 018 Precooked Bacon, South  
 EU 019 Precooked Bacon, North  
 EU 020 Precooked Bacon, East  
 EU 021 Precooked Bacon, West  
 EU 029 Bacon Bits Precooked Line  
 SV 019 Precooked Bacon Stack (For EU018 & EU019)  
 SV 020 Precooked Bacon Stack (For EU020 & EU021)  
 SV 028 Bacon Bits Line (For EU029)

What to do	Why to do it
EMISSION LIMITS	hdr
Total Particulate Matter: less than 0.30 grains/dry standard cubic foot unless required to reduce emissions to meet the less stringent limit of either 7011.0730 or 7011.0735 (table 1 and 2, respectively).	Minn. R. 7011.0715, subp. 1(A)
Opacity: less than or equal to 20 percent opacity	Minn. R. 7011.0715, subp. 1(B)
OPERATING REQUIREMENTS	hdr
Vent all emissions from the precooked bacon fryers through mist eliminators, CE006 and CE007.	Minn. R. 7007.0800, subp. 2
MONITORING AND RECORDKEEPING	hdr
<p>Precooked Bacon Control Equipment Check: A differential pressure reading shall be taken once each operating day for each mist eliminator associated with the Precooked Bacon Line(s). The mist eliminator shall operate within the manufacturer's recommended differential pressure rating. This rating should be listed in the O &amp; M Plan for these units.</p> <p>If any readings are taken that are not in the recommended differential pressure range, the permittee shall implement corrective action according to the O &amp; M Plan for the respective unit(s). Records shall be kept of the date, time and result of each observation taken along with any corrective actions taken.</p>	Minn. R. 7007.0800, subp. 4 and 5



**TABLE A: LIMITS AND OTHER REQUIREMENTS**

02/12/02

Facility Name: Hormel Foods Corp - Austin

Permit Number: 09900002 - 004

**Subject Item:** GP 008 Boilers (29.4, 29.4 MMBtu/hr- Natural Gas)**Associated Items:** EU 044 Boiler #6 (29.4 MMBtu/hr)

EU 045 Boiler #7 (29.4 MMBtu/hr)

What to do	Why to do it
Fuel Allowed: limited to natural gas and refined animal fats	Minn. R. 7007.0800, subp. 2
Record and maintain records of the quantity of natural gas that each of the Dc boilers combust on a monthly basis.	40 CFR 60.48(g)

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

02/12/02

Facility Name: Hormel Foods Corp - Austin

Permit Number: 09900002 - 004

**Subject Item: GP 009 All Boilers**

**Associated Items:** EU 001 Gas/Oil Fired Boiler  
 EU 002 Gas/Oil Fired Boiler  
 EU 003 Gas/Oil Fired Boiler  
 EU 004 Gas/Oil Fired Boiler  
 EU 005 Gas/Oil Fired Boiler  
 EU 044 Boiler #6 (29.4 MMBtu/hr)  
 EU 045 Boiler #7 (29.4 MMBtu/hr)

What to do	Why to do it
Sulfur Dioxide: less than or equal to 247 tons/year using 12-month Rolling Sum	Title I Condition: To limit potential SO <sub>2</sub> emissions to less than major source levels defined by 40 CFR Section 52.21
<p>Keep a daily log of the usage of residual oil, used oil, and refined animal fats. The daily log may group EU 001 through EU 005 and EU 044 through EU 045. By the 15th day of each month:</p> <p>1) Calculate and record the residual oil, used oil, and refined animal fats usage for the previous calendar month (in gallons).</p> <p>2) Calculate the average sulfur content of the residual oil, used oil, and refined animal fats for the previous calendar month. The average sulfur content shall be based on fuel supplier certification or test data.</p> <p>3) Calculate the number of tons of SO<sub>2</sub> emitted during the previous calendar month using the following equation:</p> $SO_2 = (0.157AX + 0.157BY + 0.157CZ)/2000$ <p>where:</p> <p>SO<sub>2</sub> is the amount of sulfur dioxide emitted during the previous month in tons  A is the number of gallons of residual oil burned during the previous month  B is the number of gallons of used oil burned during the previous month  C is the number of gallons of refined animal fat burned during the previous month  X is the average weight percent of sulfur in residual oil  Y is the average weight percent of sulfur in used oil  Z is the average weight percent of sulfur in refined animal fats</p> <p>4) Calculate the 12-month rolling sum of SO<sub>2</sub> emissions by adding the results of the above equation for the previous 12 months.</p>	Title I Condition: To limit potential SO <sub>2</sub> emissions to less than major source levels defined by 40 CFR Section 52.21
Refined Animal Fats Sulfur Content: Perform an analysis during each 12-month period following permit issuance to determine weight percent sulfur content in refined animal fats. The first analysis shall be performed within 180 days of permit issuance.	Title I Condition: To limit potential SO <sub>2</sub> emissions to less than major source levels defined by 40 CFR Section 52.21
Nitrogen Oxides: less than or equal to 200 tons/year using 12-month Rolling Sum	Title I Condition: To limit potential NO <sub>x</sub> emissions to less than major source levels defined by 40 CFR Section 52.21
Performance Test: due 180 days after Initial Startup of operation when combusting refined animal fats for NO <sub>x</sub> emissions. Performance testing shall be performed when burning only refined animal fats in EU 001, EU 002, EU 003, EU 004, or EU 005 and when burning only refined animal fats in EU 044 or EU 045.	Title I Condition: To limit potential NO <sub>x</sub> emissions to less than major source levels defined by 40 CFR Section 52.21

# TABLE A: LIMITS AND OTHER REQUIREMENTS

02/12/02

Facility Name: Hormel Foods Corp - Austin

Permit Number: 09900002 - 004

<p>Keep a daily log of the usage of residual oil, used oil, and refined animal fats. The daily log may group EU 001 through EU 005 and EU 044 through EU 045. By the 15th day of each month:</p> <p>1) Calculate and record the residual oil, used oil, and refined animal fats usage for the previous calendar month (in gallons).</p> <p>2) Calculate the number of tons of NOx emitted from EU 001 through 005 during the previous calendar month using the following equation:</p> $\text{NOx} = (0.055A + XB + 0.0001C)/2000$ <p>3) Calculate the number of tons of NOx emitted from EU 044 through 045 during the previous calendar month using the following equation:</p> $\text{NOx} = (XB + 0.0001C)/2000$ <p>where:</p>	<p>Title I Condition: To limit potential NOx emissions to less than major source levels defined by 40 CFR Section 52.21</p>
<p>NOx is the amount of nitrogen oxides emitted during the previous month in tons  A is the number of gallons of residual oil and used oil burned during the previous month  B is the number of gallons of refined animal fats burned during the previous month  C is the number of cubic feet of natural gas combusted  X is the most recent most recent test result for NOx emissions from refined animal fats in pounds per gallon</p> <p>4) Calculate the total monthly NOx emissions by adding the results from items 2 and 3.</p> <p>5) Calculate the 12-month rolling sum of NOx emissions by adding the results of the above equation for the previous 12 months.</p>	<p>Title I Condition: To limit potential NOx emissions to less than major source levels defined by 40 CFR Section 52.21</p>

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

02/12/02

Facility Name: Hormel Foods Corp - Austin

Permit Number: 09900002 - 004

**Subject Item:** EU 026 Belt Grill Precooked Line**Associated Items:** CE 010 Mist Eliminator - High Velocity, i.e., V>250 Ft/Min

SV 025 Koppens Grill Stack

What to do	Why to do it
EMISSION LIMIT	hdr
Total Particulate Matter: less than or equal to 0.30 grains/dry standard cubic foot unless required to reduce emissions to meet the less stringent limit of either 7011.0730 or 7011.0735 (table 1 and 2, respectively).	Minn. R. 7011.0715, subp. 1(A)
Opacity: less than or equal to 20 percent opacity	Minn. R. 7011.0715, subp. 1(B)
MONITORING AND RECORDKEEPING	hdr
Koppens Grill Control Equipment Check: A differential pressure reading shall be taken once each operating day for the mist eliminator associated with the Koppens Grill. The mist eliminator shall operate within the manufactures recommended differential pressure rating. This rating should be listed in the O & M Plan for these units.  If any readings are taken that are not in the recommended differential pressure range, the permittee shall implement corrective action according to the O & M Plan for the respective unit(s). Records shall be kept of the date, time and result of each observation taken along with any corrective actions taken.	Minn. R. 7007.0800, subp. 4 and 5

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

02/12/02

Facility Name: Hormel Foods Corp - Austin

Permit Number: 09900002 - 004

**Subject Item:** EU 027 Rendering Area**Associated Items:** CE 008 Room Air Scrubber

SV 026 Rendering Room Scrubber Stack

What to do	Why to do it
EMISSION LIMITS	hdr
Total Particulate Matter: less than or equal to 8.38 lbs/hour	Title I Condition: to limit particulate emissions to less than major source levels as defined by 40 CFR 52.21. Also meets Minn. R. 7011.0715, subp. 1(A)
Opacity: less than or equal to 20 percent opacity	Minn. R. 7011.0715, subp. 1(B)
MONITORING AND RECORDKEEPING	hdr
Rendering Area Control Equipment Check: A differential pressure reading shall be taken once each operating day for the scrubber associated with the Rendering Area Room Air. The scrubber shall operate within the recommended pressure range listed in the O & M Plan for these units.  If any readings are taken that are not in the recommended differential pressure range, the permittee shall implement corrective action according to the O & M Plan for the respective unit(s). Records shall be kept of the date, time and result of each observation taken along with any corrective actions taken.	Minn. R. 7007.0800, subp. 4 and 5

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

02/12/02

Facility Name: Hormel Foods Corp - Austin

Permit Number: 09900002 - 004

**Subject Item:** EU 028 Rendering Machinery**Associated Items:** CE 009 Venturi Scrubber/pkd twr

SV 027 Rendering Process Scrubber Stack (For EU028)

What to do	Why to do it
EMISSION LIMITS	hdr
Total Particulate Matter: less than or equal to 7.34 lbs/hour	Title I Condition: To limit potential particulate emissions to less than major source levels as defined by 40 CFR 52.21. Also meets limit set by Minn. R. 7011.0715, subp. 1(A)
Opacity: less than or equal to 20 percent opacity	Minn. R. 7011.0715, subp. 1(B)
MONITORING & RECORDKEEPING	hdr
Rendering Machinery Control Equipment Check: A differential pressure reading shall be taken once each operating day for the venturi scrubber associated with the Rendering Machinery. The scrubber shall operate within the recommended pressure range listed in the O & M Plan for these units.  If any readings are taken that are not in the recommended differential pressure range, the permittee shall implement corrective action according to the O & M Plan for the respective unit(s). Records shall be kept of the date, time and result of each observation taken along with any corrective actions taken.	Minn. R. 7007.0800, subp. 4 and 5

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

02/12/02

Facility Name: Hormel Foods Corp - Austin

Permit Number: 09900002 - 004

**Subject Item:** EU 036 Blood Dryer**Associated Items:** CE 018 Packed-Gas Adsorption Column

SV 033 Blood Dryer

What to do	Why to do it
EMISSION LIMITS	hdr
Total Particulate Matter: less than or equal to 0.3 grains/dry standard cubic foot unless required to reduce emissions to meet the less stringent limit of either 7011.0730 or 7011.735 (table 1 and 2, respectively.)	Minn. R. 7011.0715, subp. 1(A)
Opacity: less than or equal to 20 percent	Minn. R. 7011.0715, subp. 1(B)
OPERATING REQUIREMENTS	hdr
Vent emissions through CE012 and CE013, the venturi and packed tower.	Minn. R. 7007.0800, subp. 2
MONITORING AND RECORDKEEPING	hdr
Control Equipment Check: A differential pressure reading shall be taken once each operating day on the venturi scrubber associated with the Blood Dryer. The venturi scrubber shall operate within a pressure range recommended in the operation and maintenance plan.  If any readings are taken that are not in the recommended differential pressure range, the permittee shall implement corrective action according to the O & M Plan for the respective unit(s). Records shall be kept of the date, time and result of each observation taken, along with any corrective actions taken.	Minn., R. 7007.0800, subp. 4 and 5

## TABLE B: SUBMITTALS

02/12/02

Facility Name: Hormel Foods Corp - Austin  
Permit Number: 09900002 - 004

Table B lists most of the submittals required by this permit. Please note that some submittal requirements may appear in Table A or, if applicable, within a compliance schedule located in Table C. Table B is divided into two sections in order to separately list one-time only and recurrent submittal requirements.

Each submittal must be postmarked or received by the date specified in the applicable Table. Those submittals required by parts 7007.0100 to 7007.1850 must be certified by a responsible official, defined in Minn. R. 7007.0100, subp. 21. Other submittals shall be certified as appropriate if certification is required by an applicable rule or permit condition.

Send any application for a permit or permit amendment to:

Permit Technical Advisor  
Permit Section  
Air Quality Division  
Minnesota Pollution Control Agency  
520 Lafayette Road North  
St. Paul, Minnesota 55155-4194

Also, where required by an applicable rule or permit condition, send to the Permit Technical Advisor notices of:

- accumulated insignificant activities,
- installation of control equipment,
- replacement of an emissions unit, and
- changes that contravene a permit term.

Unless another person is identified in the applicable Table, send all other submittals to:

Supervisor  
Compliance Determination Unit  
Air Quality Division  
Minnesota Pollution Control Agency  
520 Lafayette Road North  
St. Paul, Minnesota 55155-4194

Send submittals that are required to be submitted to the U.S. EPA regional office to:

Mr. George Czerniak  
Air and Radiation Branch  
EPA Region V  
77 West Jackson Boulevard  
Chicago, Illinois 60604

Send submittals that are required by the Acid Rain Program to:

U.S. Environmental Protection Agency  
Clean Air Markets Division  
1200 Pennsylvania Avenue NW (6204N)  
Washington, D.C. 20460



**TABLE B: RECURRENT SUBMITTALS**

02/12/02

Facility Name: Hormel Foods Corp - Austin

Permit Number: 09900002 - 004

What to send	When to send	Portion of Facility Affected
Semiannual Deviations Report	due 30 days after end of each calendar half-year following Permit Issuance. The first semiannual report submitted by the Permittee shall cover the calendar half-year in which the permit is issued. The first report of each calendar year covers January 1 - June 30. The second report of each calendar year covers July 1 - December 31.	Total Facility
Compliance Certification	due 31 days after end of each calendar year following Permit Issuance (for the previous calendar year). To be submitted on a form approved by the Commissioner, both to the Commissioner, and to the U.S. EPA regional office in Chicago. This report covers all deviations experienced during the calendar year. The EPA copy shall be sent to: Mr. George Czerniak, Chief, Air Enforcement and Compliance Assurance Branch, Air and Radiation Division, EPA Region V, 77 West Jackson Boulevard, Chicago, Illinois 60604>	Total Facility
Emissions Inventory Report	due 91 days after end of each calendar year following Permit Issuance (April 1). To be submitted on a form approved by the Commissioner.	Total Facility

**TECHNICAL SUPPORT DOCUMENT**  
**For**  
**DRAFT AIR EMISSION PERMIT 09900002-004**

This technical support document is for all the interested parties of the draft permit. The purpose of this document is to set forth the legal and factual basis for the draft permit conditions, including references to the applicable statutory or regulatory provisions.

**1. General Information**

1.1. Applicant and Stationary Source Location:

Owner/Operator Address	Facility Address and Telephone Number (SIC Code: 3644)
Hormel Foods Corporation 1 Hormel Place Austin, Minnesota 55912	Hormel Foods Corporation 500 14 <sup>th</sup> Avenue North East Austin, Minnesota 55912  (507) 437-5972

1.2. Description of the Facility

The Hormel Foods Corporation (Hormel) facility is a meat processing plant. At the plant, Quality Pork Processors (QPP) slaughters hogs, and Hormel then processes the hogs and produces ham, bacon, dry sausage, fresh sausage, Spam<sup>™</sup>, and other meat products. Byproducts consist of blood, cracklings, bone meal, and choice white grease (CWG), a component of a broader category of substances known as Refined Animal Fats (RAF).

Emissions from five gas-oil fired boilers are discharged to the atmosphere from one stack. Emissions from two natural gas fired boilers are discharged to the atmosphere via separate stacks. Emissions from five process ovens that use natural smoke, are treated with venturi scrubbers before discharge to the atmosphere, while emissions from seven process ovens that utilize “liquid smoke” discharge without emission control. Emissions from four precooked bacon units and a bacon bits line are treated in mist eliminators before discharge. A Fulton Heater heats the heat transfer medium for a Koppens Grill which cooks smoked bacon. Emissions from the natural gas fired Fulton Heater are discharged to the atmosphere while the emissions from the Koppens Grill are treated in a mist eliminator before being discharged. Four microwave transmitters supply energy to a bacon bits line. Emissions from the bacon bits line are treated with the same mist eliminator that serves the Koppens Grill.

A natural gas standby emergency generator is vented directly to the atmosphere. The emissions from a series of rendering process units are directly treated in the Rendering Process Scrubber before discharge. Process emissions not collected by the rendering scrubber from this rendering area are treated in the Room Air Scrubber before discharge.

### 1.3. Description of the Activities Allowed by this Permit Action

Hormel has requested a permit to combust RAF as an alternative fuel source in the seven boilers currently existing at the facility. Boilers 1 through 5 are currently capable of combusting No. 6 Fuel Oil and will be capable of combusting RAF without physical modifications. Boilers 6 and 7, however, are currently capable only of combusting natural gas and will need to be modified to accommodate RAF.

The facility is currently synthetic minor for Prevention of Significant Deterioration Program (PSD) through incorporation of a 247 tons per year (TPY) limit on sulfur dioxide (SO<sub>2</sub>) emissions in the Title V permit. Because nitrogen oxides (NO<sub>x</sub>) emissions are greater for No. 6 fuel oil and RAF than natural gas, adding RAF combustion capability to Boilers 6 and 7 will require implementation of a new synthetic minor facility-wide limit on NO<sub>x</sub> emissions. This limit will be set at 200 tons per year to accommodate future modifications, while keeping the non-major total facility PSD status relative to NO<sub>x</sub> emissions. Before the modification, the NO<sub>x</sub> potential to emit (PTE) is 208.2 TPY for all existing boilers. After the modification, the limited NO<sub>x</sub> will be limited to 200.0 TPY, thereby reducing the total facility NO<sub>x</sub> PTE by 8.2 TPY.

In addition to the activities described above, this permit action will also incorporate permit changes relative to an administrative permit amendment application received by the Minnesota Pollution Control Agency (MPCA) on February 1, 2001. Two new smoke generators are being added to the facility as replacements for existing smoke generators controlled by venturi scrubbers. The new smoke generators will generate emissions below State of Minnesota permitting thresholds. Therefore, the existing permit requirements relative to the venturi scrubbers are being removed with this permit action.

#### 1.4. Facility Emissions:

**Table 1. Emissions Associated with the Modification**

Pollutant	Potential to emit from the modification (lb/hr)	Potential to emit from the modification (TPY)	*Emission increases authorized with this permit action (TPY)	*Emission decreases authorized with this permit action (TPY)	**Other contemporaneous emission increases/decreases (TPY)	Net emission change (TPY)	NSR/ 112(g) threshold level (TPY)	NSR/ MACT review required (Yes or No)
PM	1.54	16.2	NA	NA	NA	16.2	250	No
PM10	1.54	16.2	NA	NA	NA	16.2	250	No
SO2	1.25	0.0	NA	NA	NA	0.0	250	No
NOx	8.97	-8.2	NA	NA	NA	-8.2	250	No
VOC	0.0	0.0	NA	NA	NA	0.0	250	No
CO	0.0	0.0	NA	NA	NA	0.0	250	No
Lead	0.0	0.0	NA	NA	NA	0.0	250	No

\* Emission increases allowed with the permit action include additions and subtractions associated with netting. If netting is done, this will be different from the potential to emit from the modification.

\*\* Other emission changes during the contemporaneous period as defined by 40 CFR 52.21, 40 CFR 52.24 or 40 CFR 51

**Table 2. Potential to Emit Summary**

Group #	Emission Units	PM tpy	PM-10 tpy	SO2 tpy	NOx tpy	CO tpy	VOC tpy	Pb tpy
GP 001	Boilers 1 through 5	39.0	39.0	NA	NA	66.0	4.3	0.1
GP 008	Boilers 6 and 7	8.7	8.7	NA	NA	21.6	1.4	0.0
GP 009	Boilers 1 through 7	47.7	47.7	247.0	200.0	87.6	5.7	0.1
	Total Facility Actual Emissions*	16.0	11.0	85.0	48.0	22.0	1.0	0.0

\*Total Facility Actual Emissions as indicated are from 1999 MPCA emissions inventory database.

**Table 3. Permit Action Classification**

Classification	Major/Affected Source	*Synthetic Minor	*Minor
PSD		X	
NAAR			
Part 70 Permit Program	X		

\* Refers to potential emissions that are less than those specified as major by 40 CFR 52.21, 40 CFR pt. 51 Appendix S, and 40 CFR pt. 70.

## 2. Regulatory and/or Statutory Basis of Emission Limits

**Table 4. Regulatory Overview\***

Emission Unit	Applicable Regulations	Comments
GP 001	Minn. R. 7007.0800, subp. 2	Boilers 1 through 5 will be limited to combusting natural gas, No. 6 fuel oil, and RAF.
GP 008	Minn. R. 7007.0800, subp. 2	Boilers 6 and 7 will be limited to combusting natural gas, and RAF.
GP 009	40 CFR pt. 52	Boilers 1 through 7 will have synthetic minor limits of 247.0 TPY and 200.0 TPY for SO <sub>2</sub> and NO <sub>x</sub> emissions, respectively, to maintain the facility's status as non-major relative to the PSD rules. In addition to the emission limits, there are also corresponding monitoring, recordkeeping, reporting, and performance testing requirements in the permit.

\* Please refer to the permit for a complete citation of regulatory requirements.

## 3. Technical Information

Emission calculations supporting the development of this permit are contained in the permit application, which is appended to this Technical Support Document. The emission factors used for calculating PTE from RAF are based on fuel analysis. These factors will be verified through the performance testing requirements in the permit.

## 4. Conclusion

Based on the information provided by Hormel Foods Corporation, the MPCA has reasonable assurance that the proposed operation of the emission facility, as described in Air Emission Permit No. 09900002-004 and this technical support document, will not cause or contribute to a violation of applicable federal regulations and Minnesota rules.

Staff Members on Permit Team: Jim Robin and Marnie Prochniak

**ATTACHMENT A  
PERMIT APPLICATION**