



Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

Southeast Regional Office • 20 Riverside Drive, Lakeville MA 02347 • 508-946-2700

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Commissioner

March 14, 2012

Mr. Wesley Atamian, President
Home Market Foods, Inc.
140 Morgan Dr.
Norwood, MA 02062-5013

RE: **PLAN APPROVAL**
Application for: BWP AQ 02
Non-Major Comprehensive Plan Application
Transmittal No.: X233938
Application No.: 4P11007
Source No.: 119-3160

AT: Home Market Foods, Inc.
140 Morgan Dr.
Norwood, MA 02062-5013

Dear Mr. Atamian:

The Department of Environmental Protection (MassDEP), Bureau of Waste Prevention, has reviewed non-Major Comprehensive Plan Application (CPA) No. 4P11007 dated January 27, 2011 with supplemental information received on December 9, 2011. CPA 4P11007 requests MassDEP approval for modifications to an existing meat processing facility operated by Home Market Foods, Inc. (herein referred to as "Home Market" or "Permittee"), at 140 Morgan Drive, Norwood, Massachusetts.

The application was submitted as required by Administrative Consent Order ACOP-SE-10-9002-27, dated March 31, 2010 with amendments dated September 8 and December 22, 2010 and in accordance with section 7.02 Plan Approval and Emissions Limitations as contained in 310 CMR 7.00 "Air Pollution Control Regulations," adopted by MassDEP pursuant to the authority granted by Massachusetts General Laws, Chapter 111, Section 142 A-E and Chapter 21C, Sections 4 and 6.

MassDEP's review has been limited to air pollution regulation compliance and does not relieve you of the obligation to comply with all other permitting requirements.

The application was submitted under the seal and signature of Eric Pearson, P.E. No. 39741 of ESS Group, Inc.

FACILITY / EQUIPMENT DESCRIPTION

The facility consists of three conveyer-type meat cooking lines, an Enviropak smoker oven, and ancillary equipment. The three ovens and the smoker oven, including the associated wet cyclone systems, will be vented to the proposed Air Clear model CS-IFP-102 multi-stage coalescing air filter (CAF) to control particulate matter, odor, and visible emissions.

The CAF, rated at 27,900 cubic feet per minute, consists of an initial fixed vane wet cyclone for initial cooling and coarse particulate removal, an indexing fabric pre-filter for additional coarse particulate removal, and a bank of 102 cylindrical coalescing filters. Water for the wet cyclone is recirculated from an internal sump that is part of the CAF unit, with overflow draining to the facility sump system and waste water treatment system. The cylindrical coalescing filters are 12-inches in diameter, 6 feet long, and constructed of a 3-inch thick fiberglass mesh within a steel frame. As material builds up on the filters, the material drains down the filter to an internal sump.

The CAF has an internal self-cleaning system, which uses hot water / steam to periodically clean the unit. The wash liquid drains into the facility sump and on-site waste water treatment system. The cleaning will be done as necessary, based on the pressure drop across the filters. The ovens and the smoker oven will not be operational during the CAF's cleaning cycle.

The CPA contains the results of emissions dispersion modeling, which was conducted on a qualitative basis. The emissions dispersion modeling was conducted in order to optimize the height of the emissions stack on the CAF. The emissions dispersion modeling was not conducted to demonstrate compliance with the National Ambient Air Quality Standards (NAAQS) nor was it conducted to demonstrate there would be no nuisance condition due to odor. MassDEP reserves all rights to require additional actions by the Permittee, including but not limited to modification of the stack height, should a nuisance condition due to odor be deemed to exist.

MassDEP is of the opinion that the application is in conformance with current air pollution control engineering practices, and hereby grants plan approval of CPA No. 4P11007 subject to the following descriptions, requirements, and provisions:

A. PRODUCTION LIMITATIONS

None

B. OPERATIONAL LIMITATIONS

The Permittee is subject to, and shall comply with, the following operational limitations.

1. The CAF and associated ventilation system shall achieve the following capture efficiency:

- a. Capture: 90 to 100%

Capture efficiency shall be determined in accordance with EPA Alternative Method 020. Passing EPA Alternative Method 020 test will be accepted as a demonstration of capture efficiency. MassDEP reserves the right to require EPA Method 204 should Alternative Method 020 be found to not be a satisfactory means to demonstrate compliance due to technical limitations of applying Alternative Method 020 to the ovens.

2. The Permittee shall operate the CAF within the following ranges:

- a. Pressure differential across the CAF: between 2 and 15 inches of water, gage.
- b. Maximum inlet temperature to the CAF: 400°F
- c. Maximum temperature at the filter compartment outlet: warning 150°F, shutdown 225°F

C. EMISSION LIMITATIONS

The Permittee is subject to, and shall comply with, the following emission limitations.

1. The Permittee shall limit the emissions of total Particulate Matter (PM), Particulate Matter 10 microns in diameter or less (PM₁₀), and Particulate Matter 2.5 microns in diameter or less (PM_{2.5}):

	PM	PM ₁₀	PM _{2.5}
grains per dry standard cubic foot (gr/dscf)	0.02	0.02	0.02
pounds per hour (lb/hr)	2.1	2.1	2.1
tons per month	2.3	2.3	2.3
tons per consecutive 12-month period (tpy)	9.2	9.2	9.2

Annual emissions are based on 8,760 hours of operation per year at the facility's maximum design capacity. The hourly and volumetric (gr/dscf) emission rates are for testing purposes only; compliance with these values does not need to be documented on a continuous basis. The volumetric emission rate (gr/dscf) includes the condensable fraction.

2. The Permittee shall take any and all measures necessary to ensure the operation of the equipment approved herein shall result in visible emissions not to exceed 5% opacity, exclusive of uncombined water vapor.

D. MONITORING, TESTING, AND RECORDKEEPING REQUIREMENTS

The Permittee is subject to, and shall comply with, the following monitoring, testing, and recordkeeping requirements.

1. The Permittee shall continuously monitor the following parameters on the CAF:
 - a. Fan operation,
 - b. Isolation damper position, connected to an indicator light only,
 - c. Inlet temperature
 - d. Outlet temperature,
 - e. Pressure drop across unit.

Fan failure or excess temperature shall trigger an automatic shutdown the CAF, activating an audible alarm.

2. The Permittee shall continuously record the following parameters on the CAF:
 - a. Pressure drop,
 - b. Inlet temperature,
 - c. Outlet temperature.
3. Records shall be maintained on a monthly basis and on a consecutive 12-month period basis (the total from the latest month plus the sum for the eleven months preceding the latest month). These records, including any other "credible evidence," shall document the compliance status of the facility regarding the conditions, provisions, and limits contained in this Plan Approval.
4. A copy of these records must be kept readily available on-site for a period of five (5) years and shall be available to MassDEP and/or US EPA personnel upon request.

E. NOTIFICATIONS AND REPORTING

The Permittee is subject to, and shall comply with, the following notification and reporting requirements.

1. MassDEP's Compliance / Enforcement Chief for the Bureau of Waste Prevention Southeast Regional Office, must be notified by telephone, or by fax within twenty-four (24) hours, and with written notification within ten (10) days, after the occurrence of any upsets or malfunctions to the facility equipment, air pollution control equipment, or monitoring equipment that results in an emission in excess of the limits contained in Section C(1) and (2) to the air and/or a condition of air pollution.

2. All notifications and reporting required by this Plan Approval shall be made to the attention of:

Department of Environmental Protection
Bureau of Waste Prevention
20 Riverside Drive
Lakeville, Massachusetts 02347

Attn: Compliance and Enforcement Section

Telephone: (508) 946-2878
Fax: (508) 947-6557
(508) 946-2865

F. SPECIAL CONDITIONS

The Permittee is subject to, and shall comply with, the following Special Conditions:

1. The CAF shall be operational whenever any oven or the smoker oven is in use. The CAF shall not be by-passed at any time, this includes during the oven and smoker oven cleaning cycles. The CAF cleaning cycle shall only occur when the ovens are not in use.

It is acceptable to operate the ovens without the CAF for inspection/ testing, provided the ovens have completed the clean in place cycle.

2. Special Condition 1 notwithstanding, in the event of an upset, malfunction, or non-routine maintenance of the CAF, the Permittee may continue to operate all ovens and the smoker oven without the CAF to allow the completion of the current batch production run. The batch production run shall be considered to include any product that is removed from the last step down cooler (prior to grinding and blending) and additional product provided it can be processed through the oven within six (6) hours.

The Permittee may request a revision of this condition through a Limited Plan Application (310CMR7.02(4)) based upon additional information developed on the cyclone performance and in consideration of improved dispersion and reduced potential to create a condition air pollution due to odor.

3. The top of the stack from the CAF shall be no less than 60 feet above ground level.
4. The Permittee shall take any and all measures necessary to ensure the operation of the facility does not result in an odor condition that causes or contributes to a condition of air pollution as defined in 310 CMR 7.09. MassDEP reserves the future right to require additional odor minimization measures to be implemented, if deemed necessary.
5. The media in the CAF shall be cleaned or replaced as necessary to ensure that the pressure differential does not exceed 15 inches of water, as established in Operational Limitation 2 of this Plan Approval.

6. The Permittee shall meet the following interim milestones for the installation of the CAF:
- Detail Design Engineering completion: April 3, 2012,
 - Procure Air Clear Unit: July 9, 2012,
 - Project/ installation complete: September, 28, 2012

The Permittee shall notify the Department upon completion of each milestone, within seven calendar days thereof.

The Permittee shall notify the Department as soon as they are aware that they will be unable to meet a specific milestone, but no later than the date of said milestone. Notification of a missed milestone shall include a description of why the milestone was missed, date the milestone will be completed, and any impact on subsequent milestones.

G. GENERAL CONDITIONS

The Permittee is subject to, and shall comply with, the following general conditions:

1. Pursuant to 310 CMR 7.01, 7.02, 7.09 and 7.10, should any nuisance condition(s), including but not limited to smoke, dust, odor or noise, occur as the result of the operation of the Facility, then the Permittee shall immediately take appropriate steps including shutdown, if necessary, to abate said nuisance condition(s).
2. If asbestos remediation/removal will occur as a result of the approved construction, reconstruction, or alteration of this Facility, the Permittee shall ensure that all removal/remediation of asbestos shall be done in accordance with 310 CMR 7.15 in its entirety and 310 CMR 4.00.
3. If construction or demolition will occur as a result of the approved construction, reconstruction, or alteration of this Facility, the Permittee shall ensure that construction or demolition shall be done in accordance with 310 CMR 7.09(2) and 310 CMR 4.00.
4. Pursuant to 310 CMR 7.01(2)(b) and 7.02(7)(b), the Permittee shall allow MassDEP and / or USEPA personnel access to the Facility, buildings, and all pertinent records for the purpose of making inspections and surveys, collecting samples, obtaining data, and reviewing records.
5. This Plan Approval does not negate the responsibility of the Permittee to comply with any other applicable Federal, State, or local regulations now or in the future.
6. Should there be any differences between the Application and this Plan Approval, the Plan Approval shall govern.

7. Pursuant to 310 CMR 7.02(3)(k), MassDEP may revoke this Plan Approval if the construction work is not commenced within two years from the date of issuance of this Plan Approval, or if the construction work is suspended for one year or more.
8. This Plan Approval may be suspended, modified, or revoked by MassDEP if MassDEP determines that any condition or part of this Plan Approval is being violated.
9. This Plan Approval may be modified or amended when in the opinion of MassDEP such is necessary or appropriate to clarify the Plan Approval conditions or after consideration of a written request by the Permittee to amend the Plan Approval conditions.
10. The Permittee shall conduct emission testing, if requested by MassDEP, in accordance with USEPA Reference Test Methods and regulation 310 CMR 7.13. If required, a pretest protocol report shall be submitted to MassDEP at least 30 days prior to emission testing and the final test results report shall be submitted within 45 days after emission testing.
11. Pursuant to 310 CMR 7.01(3) and 7.02(3)(f), the Permittee shall comply with all conditions contained in this Plan Approval. Should there be any differences between provisions contained in the General Conditions and provisions contained elsewhere in the Plan Approval, the latter shall govern.

MassDEP has determined that the filing of an Environmental Notification Form (ENF) with the Secretary of Environmental Affairs, for air quality control purposes, was not required prior to this action by MassDEP. Notwithstanding this determination, the Massachusetts Environmental Policy Act (MEPA) and Regulations 301 CMR 11.00, Section 11.04, provide certain "Fail-Safe Provisions," which allow the Secretary to require the filing of an ENF and/or an Environmental Impact Report (EIR) at a later time.

The enforceable conditions contained herein, establish the federally enforceable status of this **PLAN APPROVAL**. MassDEP reserves the right to require changes in the standard operating and/or maintenance procedures and record keeping systems, and to require additional process monitoring if it is determined necessary by MassDEP to ensure continuous compliance with the Air Quality Control Regulations contained in 310 CMR 7.00.

This Approval is an action of MassDEP; you have a limited right to appeal. Please refer to the enclosed "APPEAL" information.

Enclosed is one stamped approved copy of the application submittal.

Should you have any questions pertaining to this PLAN APPROVAL, please contact Thomas Cushing at the Regional Office at (508) 946-2824.

Very truly yours,

**This final document copy is being provided to you electronically by the
Department of Environmental Protection. A signed copy of this document
is on file at the DEP office listed on the letterhead.**

John K. Winkler, Chief
Permit Section
Bureau of Waste Prevention

W/TC

Enclosure

ecc: Norwood Board of Health, attn: S. Reiss
Norwood Fire Department
E. Pearson, ESS Group, Inc.
L. Carlson DEP/SERO
G. Hunt DEP/SERO
L. Black DEP/SERO
Yi Tian DEP/Boston

ATTACHMENT 1

APPEAL OF APPROVAL

This Approval is an action of MassDEP. If you are aggrieved by this action, you may request an adjudicatory hearing. A request for a hearing must be made in writing and postmarked within twenty-one (21) days of the date of issuance of this Approval.

Under 310 CMR 1.01(6)(b), the request must state clearly and concisely the facts, which are the grounds for the request, and the relief sought. Additionally, the request must state why the Approval is not consistent with applicable laws and regulations.

The hearing request along with a valid check payable to Commonwealth of Massachusetts in the amount of one hundred dollars (\$100.00) must be mailed to:

Commonwealth of Massachusetts
Department of Environmental Protection
P.O. Box 4062
Boston, MA 02211

The request will be dismissed if the filing fee is not paid, unless the appellant is exempt or granted a waiver as described below.

The filing fee is not required if the appellant is a city or town (or municipal agency), county, or district of the Commonwealth of Massachusetts, or a municipal housing authority.

MassDEP may waive the adjudicatory hearing filing fee for a person who shows that paying the fee will create an undue financial hardship. A person seeking a waiver must file, together with the hearing request as provided above, an affidavit setting forth the facts believed to support the claim of undue financial hardship.