



Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

Central Regional Office • 8 New Bond Street, Worcester MA 01606 • 508-792-7650

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March 4, 2015

Mr. Barry Krysiak
UTZ Quality Food Inc.
759 Water Street
Fitchburg, MA 01420

RE: Fitchburg
Transmittal No.: X262460
Application No.: CE-14-025
Class: NM25
FMF No.: 133972
AIR QUALITY PLAN APPROVAL

Dear Mr. Krysiak:

The Massachusetts Department of Environmental Protection (“MassDEP”), Bureau of Air and Waste, has reviewed your Limited Plan Application (“Application”) listed above. This Application concerns the Plan Approval consolidation and an update of existing Plan Approvals pertaining to UTZ Quality Foods, Inc., a potato chip manufacturing facility located at 759 Water Street in Fitchburg, Massachusetts (“Facility”).

This Application was submitted in accordance with 310 CMR 7.02 Plan Approval and Emission 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-O, Chapter 21C, Section 4 and 6, and Chapter 21E, Section 6. MassDEP’s review of your Application has been limited to air pollution control regulation compliance and does not relieve you of the obligation to comply with any other regulatory requirements.

MassDEP has determined that the Application is administratively and technically complete and that the Application is in conformance with the Air Pollution Control regulations and current air pollution control engineering practice, and hereby grants this **Plan Approval** for said Application, as submitted, subject to the conditions listed below.

Please review the entire Plan Approval, as it stipulates the conditions with which the Facility owner/operator (“Permittee”) must comply in order for the Facility to be operated in compliance with this Plan Approval.

1. DESCRIPTION OF FACILITY AND APPLICATION

This Company was formerly called Wachusett Potato Chip Co., (783 Water Street, Fitchburg, MA) Inc. Potatoes are received each day of operation and stored in storage containers within a climate-controlled room. The Facility operates two shifts per day. When demanded by cooking operations, potatoes are forwarded via a mechanical conveyor belt system from the storage room to the cooking room.

Potatoes are then peeled in a series of horizontal rubber coated drums, which abrade the peel from the potato surface. A constant flow of potable city water moves the peel away from the potato.

Peeled potatoes are conveyed to a slicer, which cuts the potatoes into the desired form. Sliced potatoes are then introduced into a horizontal drum rinse cylinder that rotates through the rinse water, removing starch from the potato. Rinsed, sliced potato is then sent through an air dryer to remove surface moisture prior to cooking.

The Salvo M3200 chip cooker (Emission Unit 3) receives the sliced potatoes, where they are submerged in vegetable oil. Heat is supplied to the vegetable oil via a process heater with a Weishaupt burner (Emission Unit 2) that utilizes natural gas fuel. Emission Unit 2 (“EU2”) results in combustion by-products being emitted to the ambient air: Volatile Organic Compounds (“VOC”), Nitrogen Oxides (“NOx”), Carbon Monoxide (“CO”), and Particulate Matter (“PM”). Emission Unit 3 (“EU 3”) results in PM and VOC emissions being discharged to the ambient air. Emissions from the chip cooker pass through a stainless steel wire mesh filter pad called a mist eliminator. The mist eliminator consists of a single, 6-inch, 2-layer woven pad that is integral to the operation of the Salvo chip cooker. The process cannot operate without the mist eliminator in place. The chip cooker is completely enclosed with make-up air provisions for the exhaust fan. Cooked chips exit the cooker, are salted, and then sent to quality assurance/quality control (QA/QC) operations.

The salted chips are inspected by an optical sensor that detects and removes out-of-spec chips prior to being transferred to the packaging room. In the packaging room, chips are seasoned and then packaged. The finished packages are stored in a warehouse before being shipped out for sale.

UTZ (under Wachusett Potato Chip) was issued air quality Plan Approval CM-85-IF-025 for its Salvo chip cooker emissions in 1985 and air quality Plan Approval TR # W057390 for the Weishaupt process heater fuel emissions in 2005.

This Plan Approval consolidates the existing Plan Approvals into one comprehensive document and redefines the previously listed “TSP” (total suspended particulates) emission limits from Plan Approval TR #CM-85-IF-025 as PM10. This **Plan Approval supersedes all prior Plan Approvals.**

2. EMISSION UNIT (EU) IDENTIFICATION

Each Emission Unit (EU) identified in Table 1 is subject to and regulated by this Plan Approval:

| Table 1 | | | |
|----------------|--------------------------|-----------------------------------|---------------------------------------|
| EU | Description | Design Capacity | Pollution Control Device (PCD) |
| 2 | Weishaupt Process Heater | 22.5 MMBTU/hr Natural gas only | NA |
| 3 | Salvo Chip Cooker | NA | Mist Eliminator |

Table 1 Key:

EU = Emission Unit Number

NA=Not Applicable

MMBTU/hr = Million British Thermal Units per Hour

PCD = Pollution Control Device

3. APPLICABLE REQUIREMENTS

A. OPERATIONAL, PRODUCTION and EMISSION LIMITS

The Permittee is subject to, and shall not exceed the Operational, Production, and Emission Limits as contained in Table 2:

| Table 2 | | | | | | |
|----------------|---|----------------------------|---|---|---|---|
| EU | Operational/ Production Limits | Air Contaminant | Emission Factors (lb/10⁶ scf) | Emission Factor (lb/ton chip produced) | Emission Limit (TPM)³ | Emission Limit (TPY)⁴ |
| 2 ¹ | NA | PM10 (total) | 7.6 | | | 0.75 |
| | | SO2 | 0.6 | | | 0.06 |
| | | NOx | 100 | | | 9.86 |
| | | CO | 84 | | | 8.28 |
| | | VOC | 5.5 | | | 0.54 |
| 3 ² | NA | PM10 (total) | | 0.98 | | 7.53 |
| | | VOC | | 0.020 | | 0.15 |
| 2 and 3 | NA | PM10 (total) | | | 1.04 | 8.28 |
| | | SO2 | | | 0.01 | 0.06 |
| | | NOx | | | 1.23 | 9.86 |
| | | CO | | | 1.04 | 8.28 |
| | | VOC | | | 0.09 | 0.69 |
| | | Opacity | | | | Shall not exceed 10% during operating times, including startup and shutdown |

Table 2 Key:

- | | |
|--|---|
| <p>% = percent CO = Carbon Monoxide lb/ ton = pound per ton lb/10⁶ scf = lb per million standard cubic foot NOx = Nitrogen Oxides</p> | <p>PM 10= Particulate Matter ≤ 10 microns in diameter PM(Total) = filterable PM + condensable PM SO₂ = Sulfur Dioxide TPM = tons per calendar month TPY = tons per consecutive 12-month period VOC = Volatile Organic Compounds</p> |
|--|---|

Table 2 Notes:

1. EU #2 Emission limits are based on AP-42 Emission Factors (EF): NOx and CO Emission factors for natural gas combustion are from AP-42 Section 1.4, Table 1.4-1 for Small boilers – max hourly fuel rate = 0.0225 million cubic feet/hr x 8760 hr/yr x EF/2000= X tons/yr pollutant. See Table 1.4-2 Emission factors for pollutants other than NOx & CO.
2. EU #3 Emission limits are based on AP-42 Emission factors (lbs/ton of potato chips produced): Table 9.13.3-3 for VOC and Table 19.13.3-2 for PM (total) emissions from a chip fryer equipped with a standard mesh pad mist eliminator (SCC 3-02-036-01). 15,374 tpy chips x EF/2000= X tons/yr pollutant
3. Tons per Month (TPM) are calculated by dividing the annual emission limit by 12.
4. Tons per year (TPY) emissions are based on maximum chip production rate of 15,374 tons/yr and 1,281 tons /month potato chips and maximum heat input of .0225 million cubic feet /hr x 8760 hr/yr = 197.1 million standard cubic feet/yr.

B. COMPLIANCE DEMONSTRATION

The Permittee is subject to, and shall comply with, the monitoring, testing, record keeping, and reporting requirements as contained in Tables 3, 4, and 5:

| Table 3 | |
|----------------|---|
| EU | Monitoring and Testing Requirements |
| 3 | <ol style="list-style-type: none"> 1. The Permittee shall install and continuously operate a differential pressure monitor on the oil mist eliminator. 2. The Permittee shall maintain a pressure drop range between 0.125- 0.5 inches of water column (WC) across the YORK oil mist eliminator 3. The Permittee shall maintain a visual alarm that indicates the differential pressure is outside the optimal operating range and that the demister is in need of cleaning. |
| Facility-wide | <ol style="list-style-type: none"> 4. The Permittee shall monitor all operations to ensure sufficient information is available to comply with 310 CMR 7.12 Source Registration. 5. If and when MassDEP requires it, the Permittee shall conduct emission testing in accordance with USEPA Reference Test Methods and Regulation 310 CMR 7.13. |

Table 3 Key:

CMR = Code of Massachusetts
 Regulations
 EU = Emission Unit Number

USEPA = United States Environmental Protection Agency

| Table 4 | |
|------------------|---|
| EU | Record Keeping Requirements |
| 2 | 1. The Permittee shall maintain monthly and annual natural gas fuel usage logs. |
| 3 | 2. The Permittee shall track and record the monthly and annual potato chip production in tons. These records shall indicate the weight of pre-packaged product produced... |
| | 3. The Permittee shall record the pressure differential across the mist eliminator once daily in a maintenance log book. The log book shall identify the date of the reading and the initials of the operator. |
| | 4. The Permittee shall record all repairs, routine maintenance, cleaning or parts replacements made to the chip cooker and the mist eliminator in a logbook. The date and time the work was conducted shall be recorded. |
| Facility Wide | 5. The Permittee shall maintain adequate records on-site to demonstrate compliance with all operational, production, and emission limits contained in Table 2 above. Records shall also include the actual emissions of air contaminant(s) emitted for each calendar month and for each consecutive twelve-month period (current month plus prior eleven months). These records shall be compiled no later than the 15 th day following each month. An electronic version of the MassDEP approved record keeping form, in Microsoft Excel format, can be downloaded at http://www.mass.gov/eea/agencies/massdep/air/approvals/limited-emissions-record-keeping-and-reporting.html#WorkbookforReportingOn-SiteRecordKeeping . |
| | 6. The Permittee shall maintain records of monitoring and testing as required by Table 3. |
| | 7. The Permittee shall maintain a copy of this Plan Approval, underlying Application and the most up-to-date SOMP for the EU(s) approved herein on-site. |
| | 8. The Permittee shall maintain a record of routine maintenance activities performed on the approved EU(s), PCD(s) and monitoring equipment. The records shall include, at a minimum, the type or a description of the maintenance performed and the date and time the work was completed. |
| | 9. The Permittee shall maintain a record of all malfunctions affecting air contaminant emission rates on the approved EU(s), PCD(s) and monitoring equipment. At a minimum, the records shall include: date and time the malfunction occurred; description of the malfunction; corrective actions taken; the date and time corrective actions were initiated and completed; and the date and time emission rates and monitoring equipment returned to compliant operation. |
| | 10. The Permittee shall maintain records to ensure sufficient information is available to comply with 310 CMR 7.12 Source Registration. |

| Table 4 | |
|------------------|--|
| EU | Record Keeping Requirements |
| Facility Wide | 11. The Permittee shall maintain records required by this Plan Approval on-site for a minimum of five (5) years. |
| | 12. The Permittee shall make records required by this Plan Approval available to MassDEP and USEPA personnel upon request. |

Table 4 Key:

CMR = Code of Massachusetts Regulations
 MassDEP = Massachusetts Department of
 Environmental Protection
 SOMP = Standard Operating and Maintenance
 Procedure

EU# = Emission Unit Number
 PCD = Pollution Control Device
 USEPA = United States Environmental Protection
 Agency

| Table 5 | |
|-------------------|--|
| EU | Reporting Requirements |
| Facility- wide | 1. The Permittee shall submit to MassDEP all information required by this Plan Approval over the signature of a “Responsible Official” as defined in 310 CMR 7.00 and shall include the Certification statement as provided in 310 CMR 7.01(2)(c). |
| | 2. The Permittee shall notify the Central Regional Office of MassDEP, BAW Permit Chief by telephone: 508-767-2845, email: Rose. Stanley @massmail.state.ma.us or fax : 508-792-7621, as soon as possible, but no later than three (3) business days after discovery of an exceedance(s) of Table 2 requirements. A written report shall be submitted to Permit Chief at MassDEP within ten (10) business days thereafter and shall include: identification of exceedance(s), duration of exceedance(s), reason for the exceedance(s), corrective actions taken, and action plan to prevent future exceedance(s). |
| | 3. The Permittee shall report every three years to MassDEP, in accordance with 310 CMR 7.12, all information as required by the Source Registration/Emission Statement Form. The Permittee shall note therein any minor changes (under 310 CMR 7.02(2) (e), 7.03, 7.26, etc.), which did not require Plan Approval. |
| | 4. The Permittee shall provide a copy to MassDEP of any record required to be maintained by this Plan Approval within 30 days from MassDEP’s request. |
| | 5. The Permittee shall submit to MassDEP for approval a stack emission pretest protocol, at least 30 days prior to emission testing, for emission testing as defined in Table 3 Monitoring and Testing Requirements. |
| | 6. The Permittee shall submit to MassDEP a final stack emission test results report, within 45 days after emission testing, for emission testing as defined in Table 3 Monitoring and Testing Requirements. |

Table 5 Key:

CMR = Code of Massachusetts Regulations MassDEP = Massachusetts Department of Environmental Protection
 EU# = Emission Unit Number

4. SPECIAL TERMS AND CONDITIONS

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

A. The Permittee is subject to and shall comply with the Special Terms and Conditions as contained in Table 6:

| Table 6 | |
|----------------|---|
| EU | Special Terms and Conditions |
| 2 | 1. The Permittee shall operate and maintain the Weishaupt process heater in accordance with manufacturer’s recommendations and good engineering practice |
| 3 | 2. The Permittee shall operate and maintain the Salvo chip cooker in accordance with the manufacturer’s recommendations and good engineering practices |
| | 3. The Permittee shall clean the oil demister according to the standard operating procedure and manufacturers’ recommendations. |
| | 4. The Permittee shall operate the variable speed drive fan according to the manufacturer’s recommendations to maintain the optimal air flow that allows for maximum particulate control at the demister. |
| | 5. The Permittee shall revise the standard operating procedures for the proper maintenance of the oil demister, as needed. |
| | 6. The Permittee shall post the current standard operating and maintenance procedures near the equipment for easy reference by the operator. |
| 2 & 3 | 7. This Plan Approval supercedes all previous Plan Approvals. |

Table 6 Key:

Cfm = cubic feet per minute
 Ft/sec = feet per second

EU = Emission Unit Number

B. The Permittee shall install and use an exhaust stack, as required in Table 7, on each of the Emission Units that is consistent with good air pollution control engineering practice and that discharges so as to not cause or contribute to a condition of air pollution. Each exhaust stack shall be configured to discharge the gases vertically and shall not be equipped with any part or device that restricts the vertical exhaust flow of the emitted gases, including but not limited to rain protection devices known as “shanty caps” and “egg beaters.”

C. The Permittee shall install and utilize exhaust stacks with the following parameters, as contained in Table 7, for the Emission Units that are regulated by this Plan Approval:

| Table 7 | | | | |
|----------------|---|--|--|--|
| EU | Stack Height Above Ground (feet) | Stack Inside Exit Dimensions (feet) | Stack Gas Exit Velocity Range (feet per second) | Stack Gas Exit Temperature Range (°F) |
| 2 | 55 | 3 | 9-13 | 400-650 |
| 3 | 55 | 3 | 4.5-6.5 | 120-220 |

Table 7 Key:

EU = Emission Unit Number

°F = Degree Fahrenheit

5. GENERAL CONDITIONS

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

- A. 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).
- B. 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.
- C. If construction or demolition of an industrial, commercial or institutional building will occur as a result of the approved construction, reconstruction, or alteration of this Facility, the Permittee shall ensure that said construction or demolition shall be done in accordance with 310 CMR 7.09(2) and 310 CMR 4.00.
- D. 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.
- E. 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.

- F. Should there be any differences between the Application and this Plan Approval, the Plan Approval shall govern.
- G. 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.
- H. 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.
- I. 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.
- J. 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.

6. MASSACHUSETTS ENVIRONMENTAL POLICY ACT

MassDEP has determined that the filing of an Environmental Notification Form (ENF) with the Secretary of Energy & 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 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.

7. APPEAL PROCESS

This Plan 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 Plan 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 Plan Approval is not consistent with applicable laws and regulations. The hearing request along with a valid check payable to the 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

This 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.

Enclosed is a stamped approved copy of the application submittal.

Should you have any questions concerning this Plan Approval, please contact Maria L'Annunziata by telephone at 508.767.2748, or in writing at the letterhead address.

Roseanna E. Stanley
Section Chief
Bureau of Air and Waste

Enclosure

ecc: Fitchburg Board of Health
MassDEP/Boston - Yi Tian
Capaccio Environmental Engineering-Lynn Sheridan