

SIGNATURE

10/3/03



State of Ohio Environmental Protection Agency

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Jeffery Wallace
Plant Manager
T. Marzetti
Allen Division
1709 Frank Road
Columbus, OH 43223

Re: Full Compliance Evaluation; ID# 1025040161; Warning Letter

Dear Mr. Wallace:

Ohio EPA, Central District Office (CDO), Division of Air Pollution Control (DAPC), appreciates T. Marzetti, Allen Division's, courtesy and cooperation extended during the June 15 and June 22, 2006, inspections and the July 2, and August 7, 2008, inspections of your facility located at 1709 Frank Road, Columbus, Ohio. The purpose of the inspections was to assure compliance with applicable permits, along with state and federal rules and regulations. We also appreciate the facility tour and information provided by you. Below is a summary of the inspection findings and any action items that need to be addressed:

FINDINGS

Chester-Jensen Cooker/Coolers (P001 and P002)

- 1. a Recordkeeping for usage of whiskey (containing volatile organic compounds) was not conducted as required for these emissions units, as of July 2, 2008. The Ohio Revised Code, ORC 3704.05(C) states "no person who is a holder of a permit issued under division (F) or (G) of section 3704.03 of the Revised Code shall violate any of its terms or conditions". Failure to maintain monthly records constitutes a violation of ORC 3704.5(C). The recordkeeping requirement contained in PTI #01-08950, Section II.C.2 issued on 10/24/2005 is as follows:

"C. Monitoring and/or Record keeping Requirements

- 2. The permittee shall maintain monthly records of the following information:

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

- c. *Beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of the whiskey gallon usage figures.*

Also, during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative whiskey gallon usage for each calendar month."

- b. The rolling 12-month summations were subsequently inspected on August 7, 2008, and were found to be satisfactory.
2. a. Wet scrubber parameters were not maintained within the range specified by the facility's PTI for these emissions units. ORC 3704.05(C) states "*no person who is a holder of a permit issued under division (F) or (G) of section 3704.03 of the Revised Code shall violate any of its terms or conditions*". Failure to keep the air pollution control device within the operational restrictions of the permit constitutes a violation of ORC 3704.5(C). The operational restrictions contained in PTI #01-08950 issued on 10/24/2005 are as follows:

"B. Operational Restrictions

2. *The permittee shall operate the oxidizing wet scrubber in a manner that complies with the following restrictions:*
 - a. *The recirculating water flow rate shall not be less than 15 gallons per minute (gpm);*
 - b. *The pH of the hypochlorite scrubber solution shall be maintained within the range of 10 to 13.5;*
 - c. *The oxidation reduction potential (ORP) of the scrubber solution at the discharge from the scrubber shall be maintained between 875 millivolts and 1,175 millivolts (at a level that ensures that a residual amount of active chlorine is always present); and*

- d. *There shall be no objectionable cooking odors in the exhaust gases from the oxidizing wet scrubber, detectable by smell off the permittee's property."*
- b. On June 29, 2006, the permittee submitted a letter requesting broader ranges in these parameters due to inherent instability of the installation.
- c. The cookers operate in a non-steady-state mode. CDO has noted the rapid changes in wet scrubber parameters due to a) rapidly changing conditions in the cookers and their emissions and b) rapid adjustments by the wet scrubber instrumentation and controls. Marzetti has installed, or is considering, the following improvements to the wet scrubber, since its start-up:

Item	Description	Purpose	Status
1	Scrubber inlet air filter	Reduce solids accumulation	Installed, except during operation
2	Water level monitoring changed from ultrasound to inductive	Reliable calibration; reduce alarms; reduce shutdowns	Installed
3	pH and ORP probes and transmitters changed	High temperature reliability	Installed
4	Water circulation heat exchanger	Reduce temperature range of circulating liquid for probes	Installed
5	Cartridge filter on circulating pump	Reduce suspended solids	Installed and removed
6	Replaced cartridge filter with Y strainer on circulating pump	Protect nozzles with no loss of flow	Installed
7	Strength of sodium hydroxide solution reduced from 25% to 12.5%	Ambient low temperature operability; eliminate gelling in injection pipe	Installed

8	Inline condenser/quench	Reduce surges of flow, temperature and VOC; moderate transient pH and ORP behavior; reduce chemical usage	Considered
9	Circulating volume increase	Retard rate of change of pH, ORP and temperature	Considered
10	Relocate sensors	More stable location	Considered
11	Raise stack height	Eliminate downwash; improve dispersion	To be installed
12	Expand permitted pH and ORP ranges	Reflect brief, transient behavior of scrubber	Requested

Marzetti has informed CDO (electronic mail, August 20, 2008) that Items 1 through 7 have been implemented. Those steps have improved the reliability of the scrubber and somewhat reduced the transient deviations of pH and ORP of the recirculating scrubber liquid from their permitted ranges. However, for brief periods of a few seconds, the pH still has excursions between 8.0 and 10.0, and the ORP still has excursions between 350 and 875 millivolts.

- d. Marzetti has indicated that it intends to raise the stack height (Item 11). Please state when Marzetti intends to complete this project and the height of the stack after the increase. (See also Action Item 2, below.)

ACTION ITEMS

1. Marzetti should initiate and maintain the appropriate record-keeping for P001 and P002 in accordance with the PTI issued on 10/24/2005. The rolling 12-month summations were inspected at the Allen Division again on August 7, 2008, and were found to be satisfactory. This action complies with the permit term, above, in Finding 1.
2. CDO requests Marzetti submit to this office application forms (using DAPC's Air Services) for an administrative modification to PTI #01-08950, in order to expand the pH ranges and indicate an increase in stack height:

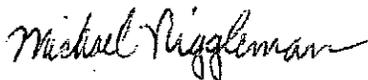
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- a. revised PTIO application forms,
- b. Emissions Activity Category (EAC) forms for P001 and P002,
- c. including pH range from 8.0 to 12.5,
- d. including ORP range from 350 to 1175 millivolts, and
- e. including stack height at least 2.2 times building height.

In its submittal, the permittee should note any further efforts or progress it has made, or will make, in reducing building downwash and in increasing stability of ORP and pH in the wet scrubber for these emissions units. For example, the permittee should state whether it intends to impement, reject or defer Items 8, 9 and 10. Please submit the above requests within 30 days of receipt of this letter.

Also attached, please find a copy of the completed inspection forms for the 2008 inspections, which will be kept on file at CDO. If you have any questions, please contact Richard Lindstrom of my staff at (614) 728-5044.

Sincerely,



Mike Riggleman
Permits and Compliance Supervisor
Division of Air Pollution Control
Central District Office

Enclosures (Inspection Report)

c: Ken Cassidy, Lancaster Colony Corporation
Richard Lindstrom, DAPC/CDO
Adam Ward, Manager, Ohio EPA, DAPC/CDO