



John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

RE: Erie County
J.H. Routh Packing Company
Notice of Violation (NOV/non-HPV)

April 30, 2013

CERTIFIED MAIL

Mr. Jeff Meyer, Plant Superintendent
J.H. Routh Packing Company
4413 West Bogart Road
Sandusky, Ohio 44870

Mr. James Mueller, P.E.
Poly Science Engineering Group, LLC
86 North Main Street
Chagrin Falls, Ohio 44022

Dear Mr. Meyer and Mr. Mueller:

As you are aware, the Northwest District Office (NWDO), Division of Air Pollution Control (DAPC) conducted an unannounced inspection on March 15, 2013 of J.H. Routh Packing Co. (here in referred to as "Routh Packing"). As a result of the inspection, DAPC requested additional information be submitted by April 25, 2013. It is our understanding that Poly Science Engineering Group, Inc. has been retained by Routh Packing to address the additional information requested. Poly Science Engineering Group, Inc. (Poly Science) provided a response letter dated April 15, 2013 to DAPC. This letter serves as a summary of DAPC's review of the information provided by Poly Science.

1. Sanitizing Operations

Poly Science indicates that 0.1% of the spray utilized in the sanitizing process contains identified hazardous air pollutants (HAPs). In order to demonstrate a "de minimis" demonstration of less than 10 pounds per day of air contaminants we can use a mass balance approach assuming that 0.1% represents the concentration of air contaminants in the cleaning solution that can be emitted to the ambient air as a mist. In order to exceed the 10 pounds per day "de minimis" threshold sanitizing operations would have to generate 10,000 pounds of mist a day which is equivalent to 1,200 gallons of cleaning solution. Therefore, DAPC believes this process would likely qualify for a "de minimis" permit exemption if the facility utilizes less than 1,200 gallons of this sanitizing spray foam per day.

The facility is requested to verify its daily use (in gallons) of the spray foam to support a "de minimis" demonstration.

2. Singeing Operations

The two torches used to singe any remaining hair from the carcass would not qualify for a permit exemption under OAC rule 3745-31-03. Please refer to OAC rule 3745-31-03(A)(1)(c), which reads:

"Fossil fuel-fired furnaces or dryers less than ten million British thermal units per hour and burning only natural gas, distillate oil (with less than or equal to 0.5 percent by weight sulfur), or liquid petroleum gas and the only emissions are from the products of combustion from fuel and water vapor and where no melting or refining occurs nor where any burning of any material occurs."

The burning of the carcass flesh and hair would emit additional particulate matter (PM) in addition to the combustion gases from the fuel. The facility is requested to submit emission calculations for its singeing operations. If emission calculations exceed ten pounds per day, Routh Packing will be required to obtain a Permit to Install/Operate (PTIO) for this emission unit.

3. Meat Smokehouse (with three chambers)

Poly Science provided emission calculations for both PM and volatile organic compounds (VOCs) based on a reduced number of hours smoking time is restricted to an estimated total of 1,276 hours per year and the estimated average of wood chips used per year is 60.6 tons. DAPC does not agree with the method presented to determine a maximum potential because Poly Science used the yearly actual emissions possible and divided by 365 days to obtain a daily average. The actual smoking time of 1,276 hours should be used to calculate the actual lbs/hr which would then have to be multiplied by 24 hours in a day to calculate the unit's potential emissions.

Based on this corrected approach, potential emissions for PM and VOC would be greater than 10 lbs/day, uncontrolled, and would not qualify as a "de minimis" air emission source; therefore, DAPC considers this to be a permissible air emission unit. The installation and operation of this emission unit is in violation of OAC rule 3745-31-02 and Ohio Revised Code 3704.05.

Routh Packing is required to submit a Permit to Install/Operate (PTIO) application, Emissions Activity Category (EAC) form, emission calculations, and a process flow diagram for this emissions unit in order to correct this administrative violation. This application will be treated as an initial installation. A permit application and EAC form can be downloaded from the following link on Ohio EPA's website: <http://epa.ohio.gov/dapc/permits/permits.aspx>. Routh Packing is required to submit the information requested no later than **May 30, 2013**.

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Mr. James Mueller
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Please be advised that the submission of the requested information to respond to this letter does not constitute waiver of the Ohio EPA's authority to seek civil penalties pursuant to ORC Section 3704.06. The Ohio EPA will make a decision on whether to pursue or decline to pursue such penalties regarding this matter at a later date.

Should you have any questions or comments concerning this letter, please feel free to contact me at (419) 373-3069 or electronically at Miranda.Garlock@epa.ohio.gov.

Sincerely,



Miranda R. Garlock
Division of Air Pollution Control

/cg

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