



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

Re: Erie County
J.H. Routh Packing Company
Resolution of Violation

May 22, 2013

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:

DAPC has reviewed information provided by your consultant, Poly Science Engineering Group, Inc. (Poly Science) in letters dated May 2, 2013 and April 15, 2013. This letter serves as a summary of DAPC's review in light of the most recent information provided by Poly Science.

1. Sanitizing Operations

The facility indicated that it utilizes a maximum of 150 gallons per day of diluted cleaner in its sanitizing operations. This daily usage rate would support a "de minimis" demonstration in accordance with OAC rule 3745-15-05; therefore, no further action is required from the facility regarding this emission unit.

2. Singeing Operations

Upon the review of other similar emission units at permitted Title V facilities in two different states, hog hair singers of this size and heating capacity have been determined to be insignificant emission units. Because non-combustion emissions are unquantifiable and appear to be negligible at this time, the singeing operations will be considered "de minimis" in accordance with OAC rule 3745-15-05; therefore, no further action is required from the facility regarding this emission source.

3. Meat Smokehouse (with three chambers)

Poly Science indicates that the smoking operations are limited to an average of a 2 hour time period within one 13 hour batch cycle. When considering the operational constraints of this emission unit and its smoking time and the potential to emit, it appears the facility could demonstrate its actual daily emissions qualify for a "de minimis" permit exemption. In order to demonstrate a "de minimis" demonstration of less than 10 lbs/day of air contaminants, the actual hourly rate of 2.52 lbs PM/hr can be divided by 10 lbs PM/day for a period of smoking time not to exceed 3.97 hours.

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Therefore, if the facility can demonstrate on a daily basis that its smoking time did not exceed 3.97 hours and its annual usage of wood chips did not exceed 60.6 tons, DAPC believes this process would likely qualify for a "de minimis" permit exemption under OAC rule 3745-15-05(D).

In order to verify that actual emissions from the source meet the requirements of OAC rule 3745-15-05(D) the facility will need to maintain records in accordance with OAC rule 3745-15-05(E) and provide them to the agency if requested. These records shall be maintained for a period of two years following the recording.

Ohio EPA requests the facility submit an example of the operational log that will be used to track the number of hours of smoke time per day. In addition, the facility will be required to track the annual tonnage of wood chips used in the smokehouse. The agency requests the facility provide this operational log by **May 31, 2013**.

4. The facility continues to remain in violation of DAPC regulations because it has failed to maintain daily records supporting a "de minimis" demonstration for the smokehouse. Therefore, if the facility is willing to maintain daily records for its smoking operations that support a "de minimis" demonstration, the smokehouse operations would not be subject to permitting; however, if the facility cannot commit to keeping daily records to support a "de minimis" demonstration for the smokehouse than it must apply for an air permit.

Please be aware that if actual emissions from this operation exceed 10 lbs/day, then the facility is required to submit a Permit-to-Install/Operate (PTIO) application.

Please note that this letter does not preclude the Director from seeking civil penalties pursuant to ORC section 3704.06 for the violation noted in the NOV letter. The decision on whether to pursue or decline to pursue such penalties regarding this is dependent on several factors, one of which is the company's future compliance with applicable Ohio EPA requirements.

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

pc: DAPC-NWDO File

ec: Miranda Garlock, NWDO, DAPC; Jeff Skebba, NWDO, DAPC; Jennifer Jolliff, NWDO, DAPC; Mark Budge, NWDO, DAPC; Jan Tredway, NWDO, DAPC; Tom Sattler, NWDO, DAPC; Bruce Weinberg, CO, DAPC; Brian Dickens, US EPA, Region 5 and James Mueller, Poly Science Engineering Group, LLC