

Bryan W. Shaw, Ph.D., P.E., *Chairman*
Toby Baker, *Commissioner*
Zak Covar, *Commissioner*
Richard A. Hyde, P.E., *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY
Protecting Texas by Reducing and Preventing Pollution

May 16, 2014

MR KEVIN GAINES
VICE PRESIDENT OF SW OPERATIONS
UNIVERSAL BLANCHERS
PO BOX 198
DUBLIN TX 76446-0198

Re: Cancellation of Air Quality Permit Number: 43537 AND 20016
Customer Number:
Regulated Entity Number: RN100745959

Dear Mr. GAINES:

We are in receipt of your letter received April 11, 2014, regarding the facility listed above. We understand that these units are switching to the standard permit for peanut handling operations. Accordingly, Permit Number 43537 AND 20016 has been voided and our records have been updated to reflect this change.

Permit Number: 43537 AND 20016
County: Erath
Permittee/Registrant: UNIVERSAL BLANCHERS

Thank you for informing us of the cancellation. If you have any questions regarding this letter, please feel free to contact me at (512) 239-1278.

Sincerely,

A handwritten signature in black ink, appearing to read "Chelsea Allen".

Chelsea Allen
Air Permits Initial Review Team (MC-161)
Air Permits Division

cc: Air Section Manager, Region 4 - Fort Worth
TCEQ Central Records (MC-198)

05/16/2014 -----NSR IMS - PROJECT RECORD -----

PROJECT#: 210705 PERMIT#: STATUS: COMPLETE DISP CODE: _____
RECEIVED: 04/11/2014 PROJTYPE: VOIDPMT AUTHTYPE: ISSUED DT: 05/16/2014
RENEWAL:
PROJECT ADMIN NAME: VOID 43537 AND 20016
PROJECT TECH NAME: VOID 43537 AND 20016
STAFF ASSIGNED TO PROJECT:
ALLEN , CHELSEA - REVIEWR1_2 - AP INITIAL REVIEW

CUSTOMER INFORMATION (OWNER/OPERATOR DATA)

ISSUED TO:

COMPANY NAME: Universal Blanchers, L.L.C.

CUSTOMER REFERENCE NUMBER: **CN600432660**

REGULATED ENTITY/SITE INFORMATIONREGULATED ENTITY NUMBER: **RN100745959**

ACCOUNT: EF0068V

PERMIT NAME:

REGULATED ENTITY LOCATION: 1033 COUNTY ROAD 343

REGION 04 - DFW METROPLEX NEAR CITY: DUBLIN

COUNTY: ERATH

PROJECT NOTES:

05/14/2014 KEVIN GAINES (254) 445-4021 KEVIN.GAINES@OLAMNET.COM

PERMIT NOTES:

TRACKING ELEMENTS:

TE Name	Start Date	Complete Date
APIRT RECEIVED PROJECT (DATE)	04/11/2014	

PERMIT VOIDS:

Permit	Void Reason
43537	COMPANY REQUESTED
20016	COMPANY REQUESTED

APR 11 2014
APIRT

April 9, 2014

Carolyn Thomas
Texas Commission on Environmental Quality
Air Permits Initial Review Team (APIRT), MC 161
12100 Park 35 Circle
Building C, Third Floor
Austin, TX 78753

AIR PERMITS DIVISION

APR 11 2014

RECEIVED

Re: Universal Blanchers, LLC. – Dublin Plant
dba: Olam Edible Nuts
Air Quality Standard Permit for Peanut Handling Operations

Dear Ms. Thomas:

This letter is to notify the Texas Commission on Environmental Quality that the Universal Blanchers facility in Dublin, Texas will be requesting revocation of their existing air permits, Permit No. C-20016 (for the blanching plant) and Permit by Rule, Registration No. 43537 (for the roasting plant). As the operating requirements for this facility comply with the requirements in the "Air Quality Standard Permit for Peanut Handling Operations", the facility will utilize this Standard Permit to cover operations at the current facility. Attached in this letter is the void form to revoke the existing air permits.

In addition, we have also enclosed information and data that demonstrates the facility's applicability and compliance with the standard permit.

If you have any questions or need any further information, feel free to contact me at (254) 445-4021 or via email at kevin.gaines@olamnet.com.

Sincerely,



Kevin Gaines
Olam Edible Nuts
Vice President of SW Operations

cc: Larry Hughes – Olam Edible Nuts
Craig Smith – Smith Aldridge, Inc.
Matthew Page – Smith Aldridge, Inc.

Attachment – A - Void Form
B - Applicability Guide
C - Emission Summary



**Texas Commission on Environmental Quality
NSR Air Permit/Registration Void Request Worksheet**

I. APPLICANT INFORMATION		
Current Owner: Kevin Gaines		
Company Contact Name: Kevin Gaines		Title: Vice President of SW Operations
Company Contact Mailing Address: P.O. Box 198,		
City: Dublin	State: Texas	ZIP Code: 76446
Phone: 254-445-4021	Fax: 254-445-3376	E-mail: kevin.gaines@olamnet.com
TCEQ Regulated Entity Number: 100745959		
Effective Date of Voidance: April 30, 2014		
II. REGISTRATIONS/PERMITS TO VOID (list each registration/permit number)		
Permit No. C-20016		
Registration No. 43537		
III. REASON FOR VOID		
☐ Consolidation ☐ Time Expired ☐ Plant Dismantled		
☒ Other: Claiming Air Quality Standard Permit for Peanut Handling Operations _____		
IV. AUTHORIZATION SIGNATURE		
I, <u>Kevin Gaines</u> , certify that I am the responsible official for this application and that, based on information and belief formed after reasonable inquiry, the statements and information on this form are true, accurate, and complete. I further understand that any permits voided at my request will not be eligible for reactivation.		
Signature: <u>Kevin Gaines</u>		Date: <u>4-9-14</u>
Title: Vice President of SW Operations		



Applicability Guide: Air Quality Standard Permit for Peanut Handling Operations

Limit/Requirement	Fulfills Requirement?	Permit Condition
Facilities authorized by this standard permit shall comply with all applicable requirements in 30 TAC Chapter 101, Subchapter H, Division 3, and 30 TAC Chapter 117.	Yes	4(A)
All conveyors and elevator legs shall be enclosed. Exhaust air shall be vented through a cyclone collection system or fabric filter system.	Yes – Conveyors are enclosed and vented through cyclones	4(B)
Fabric Filter Systems shall operate without tears or leaks	Not Applicable, Fabric filters are not used at facility	4(C)(i)
The outlet grain loading for the fabric filter systems shall not exceed 0.01 gr/dscf.	Not Applicable, Fabric filters are not used at facility	4(C)(ii)
The opacity of emissions from any fabric filter shall not exceed 5% averaged over a 6-minute period.	Not Applicable, Fabric filters are not used at facility	4(C)(iii)
Cyclone collection systems shall be operated properly without leaks.	Yes	4(C)(iv)
Cyclone collectors shall be high efficiency cyclones with a cone length at least twice the diameter of the cyclone.	Yes	4(C)(v)
The opacity of emissions from any cyclone shall not exceed 10% averaged over a 6-minute period.	Yes	4(C)(vi)

Limit/Requirement	Fulfills Requirement?	Permit Condition
The peanut dryer shall not emit visible emissions from the property.	<i>Yes</i>	<i>4(D)</i>
The dryer/burner shall only utilize pipeline quality sweet natural gas or propane.	<i>Yes</i>	<i>4(E)</i>
All stoners, cleaners, screens, aspirators, shellers, and any other peanut cleaning equipment authorized by this standard permit and handling material pneumatically shall be equipped with either a cyclone or fabric filter system as specified in subsection 4(C) of this standard permit.	<i>Yes, cyclones used</i>	<i>4(F)</i>
All fan discharges from grinders and hammermills shall be equipped with a fabric filter system.	<i>Not Applicable – No grinders and hammermills on site</i>	<i>4(G)</i>
All pelletizing systems shall vent the exhaust air to a cyclone system before releasing the exhaust air to the atmosphere. (If the cyclone is used as a product separator, the requirements in 4(C) do not apply)	<i>Yes, cyclones used</i>	<i>4(H)</i>
All loadout devices (augers, drop spouts, etc.) shall be equipped with drop socks at the drop points to minimize fugitive emissions from loadout areas.	<i>Yes</i>	<i>4(I)</i>
Spillage of any raw products, finished products, and waste products shall be cleaned up on a daily basis. Waste products shall be removed on a daily basis from the site or shall be stored in a container manner that prevents exposure to the elements. Raw products and finished products shall be stored in a contained manner that prevents exposure to the elements.	<i>Yes</i>	<i>4(J)</i>
One or more of the following methods shall be used to control emissions from all in-plant roads, truck loading and unloading areas, parking areas, and other traffic areas to maintain compliance with all TCEQ rules and regulations; (i) Sprinkling with water as necessary (ii) Treating with effective dust suppressant(s) as necessary; (iii) Paving and cleaning as necessary	<i>Yes – The facility will record the specific method and date of usage</i>	<i>4(K)</i>

Limit/Requirement	Fulfills Requirement?	Permit Condition
All air pollution abatement equipment shall be checked every 30 days and shall be properly maintained and operated. Scheduled cleaning and maintenance of the abatement equipment shall be performed as recommended by the manufacturer and as necessary so that the equipment efficiency is adequately maintained.	Yes	4(L)
All facilities and associated equipment (including any transfer equipment) must be maintained in good working order and operated properly.	Yes	4(M)
Maximum hourly facility production capacities shall not exceed the values used to determine compliance with the 24-hour NAAQS for particulate matter less than or equal to 10 microns in diameter (PM ₁₀)	Yes – Facility-wide PM/PM ₁₀ /PM _{2.5} emissions are below 9.60 lbs/hr. See Attachment C.	4(N)
For all peanut handling operations and planned maintenance, start-up, and shutdown (MSS) facilities and activities authorized by this standard permit, the following records shall be maintained at the site for a rolling 24-month period and be made available at the request of personnel from the TCEQ or any other air pollution control agency or program having jurisdiction: (i) All records to demonstrate that the peanut handling operation meets the applicable emission rate and minimum setback distance limitations determined by using Figure 1 of this standard permit. (ii) Records of periodic monitoring and scheduled cleaning and maintenance of the abatement equipment to demonstrate compliance with subsection (L) (iii) Records containing sufficient information to demonstrate compliance with paragraphs (6)(C)(i) through (6)(C)(iv) of this standard permit that include a. The type and reason for the facility or facility b. The processes and equipment involved; c. The date, time, and duration of the activity or facility operation; and d. The amount of material usage and emission rates	Yes, records are continuously kept in the recordkeeping system	4(O)

Limit/Requirement	Fulfills Requirement?	Permit Condition
The emission rate for the peanut handling operations shall be determined using calculation methods accepted by the TCEQ Air Permits Division at the time of the standard permit claim;	<i>Yes -- See Attachment C</i>	5(A)(i)
A peanut handling operation shall meet one of the following scenarios: a. Total PM₁₀ emissions from the site shall be less than or equal to 9.60 lb/hr; or b. Total PM₁₀ emissions from the site may be greater than 9.6 lb/hr if all facilities emitting PM₁₀ at the site meet the minimum setback distance to the property line as determined in Figure 1 of this standard permit. The minimum setback distance shall be measured from each facility emission point or maintenance activity emission point to the nearest property line using the shortest distance to that property line. All facility emission points must meet the minimum setback distance requirements determined by using Figure 1 of this standard permit.	<i>Yes, the facility is in accordance with scenario A. Potential PM/PM₁₀/PM_{2.5} emissions are below 9.60 lbs/hr. See Attachment C.</i>	5(ii)

Attachment C

Table 1: Olam - Dublin Plant: Potential PM Emissions from Peanut Processing Using Test Data Derived Emission Rates

Emission Unit ID	Emission Unit Description	APCD ID	APCD Description	Flow Rate Design Maximum (dscfm)	Total PM Concentration ² (gr/dscf)	Total PM Emissions (lb/hr)	Total PM Emissions ¹ (tpy)
DS01	Destoner Separator	C001	Cyclone 1	16000	0.0045	0.61	2.67
GS01	Gravity Separator No. 1	C002	Cyclone 2	17000	0.0044	0.64	2.81
TS01	Transfer Sorter No. 1						
OV01	Drying Oven No. 1	None	N/A	21000	0.0047	0.84	3.67
DC01	Drying Oven Cooler	None	N/A	15000	0.0047	0.60	2.62
BL01	Nut Blanching	C003	Cyclone 3	17000	0.0045	0.65	2.84
SR01	Post Blanching Sorter #1	C004	Cyclone 4	12000	0.0045	0.46	2.00
RO01	Roasting Oven	None	N/A	21000	0.0047	0.84	3.67
RC01	Roasting Oven Cooler	None	N/A	15000	0.0047	0.60	2.62
RS01	Roasting Sorter Operations	C005	Cyclone 5	17000	0.0045	0.65	2.84
						5.88	25.7

Notes

1 PM Emissions, tpy = (Flow Rate, dscfm) * (Concentration, gr/dscfm) * (60 min/hr) * (8,760 hr/yr) / (7,000 gr/lb) / (2,000 lb/ton)

2 New PM limits derived from 2/2014 test results and scaled up by a factor of 2.