PUBLIC NOTICE DRAFT PERMIT REVIEW SUMMARY

Permit Writer: Slater Smith Date: July 11, 2017

Company Name: Omega Protein, Inc

Facility Location: 5735 Elder Ferry Road

Moss Point, MS 39562

Source Number: 1280-00030

County: Jackson

PROJECT DESCRIPTION

Omega Protein, Inc (Omega Protein) is a seasonal menhaden fish meal processor which operates about 28 weeks starting mid-April and continuing through November. Omega Protein has potential to emit volatile organic compounds (VOC) in excess of the major source threshold of 100 tons per year (TPY). However, Omega Protein has imposed limitations on annual hours of fish processing and annual number of fish processed in order to remain below the VOC major source threshold.

Omega Protein is submitting modification application to add 800 and 1,200 hours of operation to Boiler No. 3 (AA-003) and Boiler No. 4 (AA-011), respectively. The increase in hours of operation will cause CO (3.72 TPY) NOx (5.88 TPY) and VOC (0.59 TPY) emissions to increase.

EMISSION CHANGES

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
|  | Emission Calculations (TPY) | | | | |
| Facility  Wide  Emissions | PM | NOx | CO | VOC | HAPs |
| Previous  Application | 19.00 | 17.41 | 26.82 | 94.47 | 1.09 |
| Current  Application | 19.27 | 23.29 | 30.54 | 95.06 | 1.26 |
| Increase | 0.27 | 5.88 | 3.72 | 0.59 | 0.15 |

The increase in operational hours for AA-003 and AA-011 is for startup/shutdowns, boiler idle time when fish is not being processed while waiting for fish to arrive, and during equipment failure. The increased hours will also be used for wash down of equipment, boiler maintenance, and boiler tuning.

NSPS AND SPECIFIC APPLICABLE REQUIREMENTS

Emission Points AA-003 and AA-011 are natural gas units, and the units are subject to state standards for particulate matter, sulfur dioxide and opacity. Since natural gas is a relatively clean burning fuel, the units should have a large margin of compliance with the PM, SO2 and Opacity standards.

MACT APPLICABILITY

Total HAP emissions from the facility are less than 10 tons per year. Since the facility’s potential emissions are less than 25 tons per year total HAPs and less than 10 tons per year for all individual HAPs, the facility is an area source of HAP emissions.

Emission Points AA-003 and AA-011 are potentially subject to 40 CFR 63, Subpart JJJJJJ which regulates HAPs for industrial, commercial, and institutional boilers for facilities that are area sources of HAPs. However, the boilers used at Omega Protein are natural gas fired, which makes them exempt per 40 CFR 63.11195(e).

EXISTING SYNTHETIC MINOR LIMITATIONS AND MONITORING REQUIRMENTS

The following are proposed limitations and monitoring requirements are to keep the facility below the Title V Major Source Threshold of 100 tons per year for PM, PM10, PM2.5, NOx, CO, and VOC:

* The facility shall limit facility wide the emissions of Volatile Organic Compounds (VOCs) to 99.0 tons per year;
* The facility shall monitor the hours of operation;
* The facility shall monitor the tons of fish processed;
* The facility shall operate emission control devices at all times when processing;
* 106 MMBTU/hr Natural Gas Boiler (AA-011) and 73.3 MMBTU/hr Natural Gas Boiler (Group, AA-013) are exempt from 40 CFR 63 Subpart JJJJJJ because the emission points are defined by 63.11237 and exempted in 63.11195(e);
* The facility’s yearly hours of operation is limited to 2,600 by the facility’s request;
  + AA-003 shall be limited to 800 additional hours, 3,400 hours total;
  + AA-011 shall be limited to 1,200 additional hours, 3,800 hours total;
* The facility shall keep Net Dip Vat (AA-029) closed when not in use;
* The facility shall limit the solution sprayed from chemical sprayer (AA-030) to 7,085 gallons per year;
* The facility shall limit the solution sprayed from deodorizer sprayer (AA-031) to 2,880 gallons per year and;
* The facility will also limit the amount of fish processed in cookers (AA-024 thru AA-026) to 255,000 tons per year (combined limit on all three cookers).

PUBLIC PARTICIPATION

The 30-day public notice period began on July 18, 2017 with the publication of a notice in the The Mississippi Press and ends August 17, 2017.

RECOMMENDATION

The staff has preliminarily decided to recommend issuance of the permit to the Mississippi Environmental Quality Permit Board as shown in the draft permit. However, the staff recommendation to the Board will be made only after a thorough consideration of all public comments.