TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION

APPLICANT

Cargill, Inc.
1845 Avenue A
Kissimmee, Florida, 34758

Cargill Animal Nutrition

Facility ID No. 0970034

PROJECT

Project No. 0970034-008-AO
Application for Minor Source Air Construction Permit
Project Name: Permit Renewal

COUNTY

Osceola County, Florida

PERMITTING AUTHORITY

Florida Department of Environmental Protection
Air Resource Management
Central District Office
3319 Maguire Blvd., Ste. 232, Orlando, FL 32803-3767

August 14, 2012 and August 30, 2012

Prepared by Stephen Amirault and Jeffrey Rustin, P.E.

GENERAL PROJECT INFORMATION

Air Pollution Regulations

Projects at stationary sources with the potential to emit air pollution are subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The statutes authorize the Department of Environmental Protection (Department) to establish regulations regarding air quality as part of the Florida Administrative Code (F.A.C.), which includes the following applicable chapters: 62-4 (Permits); 62-204 (Air Pollution Control – General Provisions); 62-210 (Stationary Sources – General Requirements); 62-212 (Stationary Sources – Preconstruction Review); 62-213 (Operation Permits for Major Sources of Air Pollution); 62-296 (Stationary Sources - Emission Standards); and 62-297 (Stationary Sources – Emissions Monitoring). Specifically, air construction permits are required pursuant to Rules 62-4, 62-210 and 62-212, F.A.C.

In addition, the U. S. Environmental Protection Agency (EPA) establishes air quality regulations in Title 40 of the Code of Federal Regulations (CFR). Part 60 specifies New Source Performance Standards (NSPS) for numerous industrial categories. Part 61 specifies National Emission Standards for Hazardous Air Pollutants (NESHAP) based on specific pollutants. Part 63 specifies NESHAP based on the Maximum Achievable Control Technology (MACT) for numerous industrial categories. The Department adopts these federal regulations on a quarterly basis in Rule 62-204.800, F.A.C.

Glossary of Common Terms

Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of this permit.

I. Project Description:

A. Applicant:

Mr. Roger Atkins, Assistant Production Manager
Cargill, Inc.
1845 Avenue A
Kissimmee, Florida, 34758

B. Application Contact:

Roger T. Caldwell, Vice President, Environmental Division
Bottorf Associates, Inc
6729 Edgewater Commerce Parkway
Orlando, Florida, 32810

C. Project Location:

1845 Avenue A
Kissimmee, Florida, 34758

D. Project Summary:

This is an air operation permit renewal.

E. Application Information:

Application Received on: 07/30/2012
Request for additional information on: 8/27/2012
Additional Information received and Application Complete on: 08/29/2012

II. PSD Applicability for Project

As provided in the application, the total project emissions will not exceed the PSD significant emissions rates; therefore, the project is not subject to PSD preconstruction review.

III. Rule Applicability

This project is subject to the preconstruction review requirements of Chapter 403, Florida Statutes and Chapters 62-204 through 62-297, Florida Administrative Code (F.A.C.), as indicated below.

Subject to:	**Y/N**	**Comments**
Rule 62-210.300, F.A.C. – Stationary Source General Requirements	Y	Not exempt from general permitting requirements
Rule 62-212.400, F.A.C. - Prevention of Significant Deterioration	N	Facility is not a PSD major
Rule 62-296.320(4), F.A.C. - General Particulate Emission Limiting Standards	Y	Grain handling operations could be a source of unconfined particulate matter emissions
Rule 62-296.400, F.A.C. - Stationary Source Emission Standards	N	There is no applicable source category
Rule 62-204.800, F.A.C. - Standards of Performance for New Stationary Sources (NSPS– 40 CFR 60)	N	There is no applicable source category
Rule 62-204.800, F.A.C. National Emission Standard for Hazardous Air Pollutants (NESHAPS – 40 CFR 61)	N	There is no applicable source category
Rule 62-297.310, F.A.C. - General Compliance Test Requirements	Y	VE testing is required for EU No(s). 001, 002, 003, 005, 006, 007, 008 prior to renewal.

IV. Summary of Emissions

Pollutant	EU No. and brief description	Potential Emissions (lbs/hr., tpy, lbs/ton, etc., as applicable)	Allowable Emissions (lbs/hr., tpy, lbs/ton, opacity, etc.)
PM	EU 002, EU004, EU 005, EU007, and EU 008	48.8 tpy (combined)	Less than 48.8 tpy (combined)
SO2	EU 003, Boiler	18 tpy	18 tpy
VE	Facility		Shall not exceed 5% opacity

A Preventative Maintenance Plan (PMP for Cyclones/fabric filters and associated quarterly logs, visible emission testing prior to renewal, and the applicant accepting a 5 percent opacity limit provides reasonable assurance that the applicant will comply with all applicable state air pollution regulations.

V. Federal NSPS and/or NESHAP Provisions

A. There are no NSPS or NESHAP Provisions

VI. Conclusions

The emission limits proposed by the applicant will meet all of the requirements of Chapters 62-204 through 297, F.A.C.

The General and Specific Conditions listed in the proposed permit (attached) will assure compliance with all the applicable requirements of Chapters 62-204 through 297, F.A.C.

VII. Preliminary Determination

The Department makes a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations as conditioned by the final permit. This determination is based on a technical review of the complete application, reasonable assurances provided by the applicant, and the conditions specified in the draft permit. Additional details of this analysis may be obtained by contacting the project engineer at the Florida Department of Environmental Protection Air Resource Management, Central District, 3319 Maguire Blvd., Ste. 232, Orlando, FL 32803-3767.

Pursuant to Section 403.087, Florida Statutes and Section 62-4.070, Florida Administrative Code, the Department hereby gives notice of its intent to issue a permit to construct the aforementioned air pollution source in accordance with the draft permit and its conditions as stipulated (see attached).