**FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION**
Southwest District Office
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926

RICK SCOTT
GOVERNOR

HERSCHEL T. VINYARD JR.
SECRETARY

# DRAFT PERMIT

**PERMITTEE**

Purina Mills, LLC
890 North Prairie Industrial Parkway
Mulberry, Florida 33860

Authorized Representative:
Mr. Steve Furst, Plant Manager

Air Permit No. 1050157-009-AC
Permit Expires: 07/31/2014
Land O' Lakes Purina Feed, LLC
Minor Air Construction Permit
Replace Cyclone in Pellet Mill System No. 2
and Permit Modifications

This is the final air construction permit to replace the cyclone and airlock in Pellet Mill System No. 2 and to modify the operation and emission limitations at the Land O' Lakes Purina Feed, LLC facility (Standard Industrial Classification No. 2048) located in Polk County at 890 North Prairie Industrial Parkway in Mulberry, Florida. The UTM coordinates are Zone 17, 401.95 km East, and 3087.11 km North. As noted in the Final Determination provided with this final permit, no changes or only minor changes and clarifications were made to the draft permit.

This final permit is organized by the following sections:

Section 1. General Information

Section 2. Administrative Requirements and Facility-wide Specific Conditions

Section 3. Emissions Unit Specific Conditions

Section 4. Appendices

Due to the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 of this permit.

This air pollution permit is issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to conduct the proposed work in accordance with the conditions of this permit. This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Upon issuance of this final permit, any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel (Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000) and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within 30 days after this order is filed with the clerk of the Department.

Executed in Hillsborough County, Florida
*DRAFT*

_____ _____

Kelley M. Boatwright Effective Date
District Air Program Administrator
Southwest District

**CERTIFICATE OF SERVICE**

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Determination, the Final Permit and the Appendices) was sent by electronic mail (or a link to these documents made available electronically on a publicly accessible server) with received receipt requested before the close of business on the date indicated below to the persons listed below.

Mr. Steve Furst, Purina Mills, LLC
(safurst@landolakes.com)

Mr. Jim Jarboe, Purina Mills, LLC
(jejarboe@landolakes.com)

Mr. Robert E. Wallace, III, P.E., Environmental Engineering Consultants, Inc.
(rwallace@eec-tampabay.com)

Clerk Stamp

**FILING AND ACKNOWLEDGMENT FILED**, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.

*DRAFT*

_____ _____
(Clerk) (Date)

## FACILITY AND PROJECT DESCRIPTION

### Existing Facility

This animal feed manufacturing facility receives dry materials such as corn, wheat, soybeans, minerals, alfalfa, peanuts or cottonseed that are either ground or pelletized in a process ultimately resulting in a finished feed product that is bagged or shipped by truck and railcar. The existing facility consists of the following emissions units (EUs).

Facility ID No. 1050157

| EU ID No. | Emissions Unit Description |
|---|---|
| 002 | Truck/ Railcar Dry Material Receiving System |
| 003 | Material Grinding System |
| 004 | Pellet Mill System No. 1 |
| 005 | Pellet Mill System No. 2 |
| 006 | Bagging and Truck Loadout System |
| 007 | Mineral Unloading System |
| 008 | Grain Cleaning System |

### Project Description and Affected Emission Units

This project replaces the cyclone associated with Pellet Mill System No. 2 (EU ID No. 005) and modifies the permit requirements for the facility as described below.

This project consists of the following:

- Replacement of the cyclone and airlock on Pellet Mill System No. 2 (EU No. 005).
- Reclassification of the Truck/ Railcar Dry Material Receiving System (EU No. 002) from a permitted emissions unit to an exempt from permitting emissions source/activity *(see Exempt Emissions Sources/Activities below)*.
- Reclassification of the Bagging and Truck Loadout System (EU No. 006) from a permitted emissions unit to an exempt from permitting emissions source/activity *(see Exempt Emissions Sources/Activities below)*.
- Removal of the tons per any consecutive 12-month period particulate matter (PM) emissions limitations for EU Nos. 003, 004, 005 and 007.
- Increasing the permitted maximum hours of operation as shown below:
  - from 2,080 to 8,760 hours in any 12 consecutive month for EU No. 003 (Grinding System);
  - from 8,320 combined hours for both pellet mill systems to 8,760 hours in any 12 consecutive month for each pellet mill system (EU Nos. 004 and 005); and
  - from 390 to 8,760 hours in any 12 consecutive month for EU No. 007 (Mineral Unloading System).

- Converting the Daily Average Maximum Throughput limits from limitations to operating capacities for the purposes of compliance testing only.
- Removal of tons per any consecutive 12-month period Equivalent Maximum Throughput references for EU Nos. 003, 007 and 008.
- Establishment of a maximum tons per any consecutive 12-month period combined throughput rate limitation for EU Nos. 004 and 005 (set at same level as previous combined Equivalent Maximum Throughput for these EU's).
- Establishment of maximum tons per any consecutive 12-month period facility dry non-mineral material receiving rate limitation (set at same level as previous Equivalent Maximum Throughput for Truck/Railcar Receiving System (previously EU No. 002)).
- Modification (reduction) of recordkeeping requirements in accordance with the above modifications to operating hour and process rate requirements.
- Permit changes required as part of conversion to the new permit document formats.

This project modifies the permit requirements for the following emissions units (EUs).

| EU ID No. | Emissions Unit Description |
|---|---|
| 003 | Dry Material Grinding System (with baghouse dust collector) |
| 004 | Pellet System No. 1 (with cyclone dust collector) |
| 005 | Pellet System No. 2 (with cyclone dust collector) |
| 007 | Mineral Unloading System (with baghouse dust collector) |
| 008 | Grain Cleaning System (with baghouse dust collector) |

***NOTE:*** *Please reference the Permit No., Facility ID, and Emission Unit ID in all correspondence, test report submittals, applications, etc.*

**Exempt Emission Sources/Activities**

- The 250-HP Cleaver Brooks steam boiler (previously EU ID No. 001) is a natural gas-fired, steam and hot water generating source that has a maximum heat input of 10.461 MMBTU/hr. (This boiler was constructed prior to applicability date of NSPS 40 CFR 60 Subpart Dc for small boilers.) [Rule 62-210.300(3)(a)34., F.A.C. (Categorical and conditional exemptions- fossil fuel steam generators.)]

- The Truck/Railcar Receiving System (previously EU ID No. 002) consists of track 1; a totally enclosed receiving area for dry materials by truck, and track 2; a partially enclosed receiving area for corn by railcar. [Rule 62-4.040(1)(b), F.A.C. (Insignificant impact.)]

- The Bagging and Truck/Railcar Loadout System (previously EU ID No. 006) consists of a totally enclosed area where finished feed products are bagged or shipped by truck and railcar [Rule 62-4.040(1)(b), F.A.C. (Insignificant impact.)

Note: Exemptions under Rule 62-4.040(1)(b), F.A.C., may be revoked if the installation is substantially modified or the basis for the exemption is determined to be materially incorrect.

## FACILITY REGULATORY CLASSIFICATION

- The facility is not a major source of hazardous air pollutants (HAPs).
- The facility has no units subject to the acid rain provisions of the Clean Air Act (CAA).
- The facility is not a Title V major source of air pollution in accordance with Chapter 62-213, F.A.C.
- The facility is not a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.
- This facility is a synthetic non-Title V source for particulate matter less than 10 micrometers in diameter ($PM_{10}$). The emission limitations and the restriction on the amount of material processed in this permit will ensure that the facility's $PM_{10}$ emissions will be below the threshold for a Title V source.

## PERMIT HISTORY/AFFECTED PERMITS

This permit replaces all previous construction permits and modifies all previous FESOP (AF) operating permit requirements.

## ADMINISTRATIVE REQUIREMENTS

**1.** Permitting Authority - The permitting authority for this project is the Florida Department of Environmental Protection (Department), Southwest District Office's Air Permitting Program. The mailing address and phone number is:

Florida Department of Environmental Protection
Southwest District Office
Air Permitting Program
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926
Telephone: 813-632-7600

All documents related to applications for permits shall be submitted to the above address.

**2.** Compliance Authority - The compliance authority for this project is the Florida Department of Environmental Protection (Department), Southwest District Office's Compliance Assurance Program. The mailing address and phone number is:

Florida Department of Environmental Protection
Southwest District Office
Compliance Assurance Program- AIR
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926
Telephone: 813-632-7600

All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the above address.

**3.** Appendices - The following Appendices are attached as part of this permit:

a. Appendix A. Citation Formats and Glossary of Common Terms;

b. Appendix B. General Conditions;

c. Appendix C. Common Conditions; and

d. Appendix D. Common Testing Requirements.

**4.** Applicable Regulations, Forms and Application Procedures - Unless otherwise specified in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.

**5.** New or Additional Conditions - For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time.
[Rule 62-4.080, F.A.C.]

**6.** Modifications - Unless otherwise exempt by rule, the permittee shall not initiate any construction, reconstruction, or modification at the facility and shall not install/modify any pollution control device at the facility without obtaining prior authorization from the Department. Modification is defined as: Any physical change or changes in the method of operations or addition to a facility that would result in an increase in the actual emissions of any air pollutant subject to air regulations, including any not previously emitted, from any emission unit or facility.
[Rules 62-210.200 - Definition of "Modification" and 62-210.300(1)(a), F.A.C.]

**7.** Annual Operating Report - On or before **April 1** of each year, the permittee shall submit a completed DEP Form 62-210.900(5), "Annual Operating Report for Air Pollutant Emitting Facility" (AOR) for the preceding calendar year. The report may be submitted electronically in accordance with the instructions received with the AOR package sent by the Department, or a hardcopy may be sent to the Compliance Authority.
[Rule 62-210.370(3), F.A.C.]

**8.** Application for Non-Title V Air Operation Permit Revision - This permit authorizes modification of the permitted emissions units and initial operation to determine compliance with Department rules. A Non-Title V air operation permit is required for continued operation of the permitted emissions unit(s). The permittee shall apply for a Non-Title V air operation permit revision at least 90 days prior to expiration of this permit, but no later than 180 days after commencing operation or commencing operation as modified. Commencing operation means setting into operation of any emissions unit for any purpose. To apply for a Non-Title V air operation permit revision, the applicant shall submit the following:

a. the appropriate permit application form *(see current version of Rule 62-210.900, F.A.C. (Forms and Instructions), and/or FDEP Division of Air Resource Management website at: http://www.dep.state.fl.us/air/)*;

b. the appropriate operation permit application fee from Rule 62-4.050(4)(a), F.A.C.;

c. a copy of the initial compliance test report required by Specific Condition No. B.4.and E.4, if not previously submitted; and

d. copies of the most recent month of records/logs specified in Specific Condition Nos. 13 and B.8; and Specific Condition Nos. A.5, B.9., C.5., and D.4. (if applicable).

The application shall be submitted to the Permitting Authority.
[Rules 62-4.030 and 62-4.050, F.A.C.]

## FACILITY-WIDE SPECIFIC CONDITIONS

## PERFORMANCE RESTRICTIONS

**9.** Permitted Capacity - This facility shall not exceed a maximum non-mineral* receiving rate of 468,000 tons per any consecutive 12-month period.

(**Permitting Note*- *Minerals are defined as any materials handled by the Material Unloading System. See Emissions Unit Section C. for Mineral Unloading System EU No. 007.)*

[Rule 62-210.200 (definition of Potential to Emit), F.A.C.]

**10**. Operating Hours - The hours of operation are not limited (8,760 hours per year).
[Rules 62-4.070(3) and 62-210.200 (definition of Potential to Emit), F.A.C.]

## EMISSIONS STANDARDS

**11.** Facility-wide Control of Unconfined (Fugitive) Emissions of Particulate Matter (PM) - All reasonable precautions shall be taken to prevent and control generation of unconfined emissions of PM. These provisions are applicable to any source, including but not limited to, vehicular movement, transportation of materials, construction, alteration, demolition or wrecking, or industrial-related activities such as loading, unloading, storing, and handling. Reasonable precautions shall include, but are not be limited to the following.

a. Paved parking and trafficked areas shall be maintained and kept free of PM build-up.

b. The truck/railcar receiving system and bagging/truck loadout system shall be totally enclosed during operation, with the exception of the railcar whole corn receiving system that is only partially enclosed.

c. The facility grounds, paved roadways, and unpaved roadways shall be controlled by water application or other fugitive PM control measure as necessary to prevent the occurrence of emissions of unconfined PM.

d. Exercise good housekeeping practices at all times.

e. Make applicable personnel aware of the environmental requirements of this permit.

If operating experience indicates that these reasonable precautions are not sufficient to control unconfined emissions, the Department or its designee reserves the right to require additional measures, such as recordkeeping for water truck gallons applied, etc.

*(Permitting Note- See also Specific Condition No. 11 for fugitive emissions opacity indicator.)*

[Rules 62-4.070(3) and 62-296.320(4)(c), F.A.C.]

**12.** Fugitive Emissions Opacity Indicator - In order to provide reasonable assurance that the precautions and practices taken at the facility are adequate, emissions of unconfined PM from all sources should not exceed five percent (5%) opacity. If the five percent (5%) opacity indicator value is exceeded, it will not be a violation in and of itself, but an indication that additional control precautions and/or practices beyond those outlined in Specific Condition No. 11 may be necessary. [Rule 62-4.070(3), F.A.C.]

## RECORDKEEPING REQUIREMENTS

**13.** Monthly Material Receiving Rate Records - In order to document continued compliance with Specific Condition No. 9, the facility shall maintain the following monthly records:

a. month and year of record;

b. the total quantity, in tons, of non-mineral* dry material received for the month; and

c. the most recent consecutive 12-month total, in tons, of non-mineral* dry material received.

(**Permitting Note- Minerals are defined as any materials handled by the Material Unloading System. See Exempt Emissions Sources/Activities)*

All records shall include the Facility ID on each page. Monthly logs shall be completed within fifteen (15) days of the end of the month.

[Rule 62-4.070(3), F.A.C.]

## A. EU No. 003- Dry Material Grinding System

This section of the permit addresses the following emissions unit (EU).

| EU ID No. | Emissions Unit Description |
|---|---|
| 003 | Dry Material Grinding System (with baghouse dust collector) – Materials such as, but not limited to, corn, oats, wheat, and barley are ground in this system. Emissions are controlled by a DCE Volks, Inc. Dalamatic Model DLM-V30-15 baghouse dust collector. |

**ADDITIONAL REQUIREMENTS**- SEE ALSO SECTION 3, SUBSECTION E. FOR COMMON CONDITIONS THAT APPLY TO THIS EMISSIONS UNIT.

### EMISSIONS STANDARDS

**A.1.** Particulate Matter (PM) Emissions Limitation - PM emissions from the Dry Material Grinding System baghouse dust collector exhaust vent shall not exceed 0.36 pounds per hour.

*(Permitting Note –Based upon this limit and operating for 8,760 hours/year, potential PM emissions for this EU are 1.58 TPY.)*

[Rule 62-210.200 (definition of Potential to Emit), F.A.C.]

**A.2.** Visible Emissions - In order to provide reasonable assurance that the Dry Material Grinding System is operated in accordance with the emissions limitation of Specific Condition No. A.1., in lieu of stack testing, visible emissions (VE) from the Dry Material Grinding System baghouse dust collector exhaust vent shall not exceed five percent (5%) opacity. Submittal of a visible emissions test showing visible emissions of no greater than 5% opacity will be accepted as documentation of compliance with the particulate matter emission limits of this permit. However, should the Department have reason to believe the particulate emission standard is not being met, the Department may require that compliance with the particulate emission standard be demonstrated by stack testing in accordance with Chapter 62-297, F.A.C.
[Rules 62-4.070(3) and 62-297.620(4), F.A.C.]

### COMPLIANCE TESTING REQUIREMENTS

**A.3.** Annual Visible Emissions (VE) Compliance Testing – In order to determine compliance with the visible emission limitation of Specific Condition No. A.2, the Dry Material Grinding System baghouse dust collector exhaust vent shall be tested for visible emissions annually each federal fiscal year (October 1- September 30). [Rule 62-297.310(7)(a)4, F.A.C.]

**A.4.** Operating Rate During Testing - Testing of emissions shall be conducted with the emissions unit operating at permitted capacity. For the purposes of testing, the permitted capacity is defined as 90 to 100 percent of the maximum operation rate of 30 tons per hour during the test period. If it is impractical to test at permitted capacity, an emissions unit may be tested at less than the maximum permitted capacity; in this case, subsequent emissions unit operating rate is limited to 110 percent of the test rate (on a daily average basis)* until a new test is conducted. Once the unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity.

(*<u>*Permitting Note*</u> – *See Specific Condition No. A.5. for associated daily operating rate record keeping requirements.*)

[Rule 62-297.310(2), F.A.C.]

**RECORDKEEPING REQUIREMENTS**

**A.5.** <u>Daily Operating Rate Recordkeeping</u> – If compliance testing is conducted at less than 90 -100% of permitted capacity such that a new lower operating limit is established (*see Specific Condition No. A.4.*), then the permittee shall keep the following daily operating records for the Dry Material Grinding System:

a. date of record and Emission Unit ID (i.e. EU No. 003);

b. tons material processed through the Dry Material Grinding System for the day (tons/day);

c. hours of operation for the Dry Material Grinding System for the day (hours/day); and

d. calculation of average tons per day processing rate based upon b. and c. above.

[Rule 62-4.070(3), F.A.C.]

## B. EU Nos. 004 and 005- Pellet Mill System No. 1 and Pellet Mill System No. 2

This section of the permit addresses the following emissions units (EUs).

| EU ID No. | Emissions Unit Description |
|---|---|
| 004 | Pellet Mill System No. 1 (with cyclone dust collector) - Pellet mash is pelletized in this system. The primary equipment includes a CPM 300 HP 7726 pellet mill, a Geelen Counterflow VK24 x 24KL pellet cooler, and to control emissions, a Geelen Cyclone CY1600HE-R dust collector. |
| 005 | Pellet Mill System No. 2 (with cyclone dust collector) - Pellet mash is pelletized in this system. The primary equipment includes a 300-HP CPM 7726 pellet mill, a Geelen Counterflow VK24 x 24KL pellet cooler, and to control emissions, a **new** Geelen Cyclone CY1600HE-R dust collector. |

**ADDITIONAL REQUIREMENTS**- SEE ALSO SECTION 3, SUBSECTION E. FOR COMMON CONDITIONS THAT APPLY TO THIS EMISSIONS UNIT**.**

### PERFORMANCE RESTRICTIONS

**B.1.** Permitted Capacity – The combined throughput rate for Pellet Mill Systems Nos. 1 and 2 shall not exceed a total of 166,400 tons in any consecutive 12-month period.
[Rule 62-210.200 (definition of Potential to Emit), F.A.C.]

### EMISSIONS STANDARDS

**B.2.** Particulate Matter (PM) Emissions Limitation – Combined PM emissions from Pellet Mill Systems Nos. 1 and 2 cyclone dust collector exhaust vents shall not a total of 6.00 pounds per hour.

*(Permitting Note –Based upon this limit and operating for 8,760 hours/year, combined potential PM emissions for these EUs are 26.28 TPY.)*

[Rule 62-210.200 (definition of Potential to Emit), F.A.C.]

**B.3.** Visible Emissions - In order to provide reasonable assurance that Pellet Mill Systems Nos. 1 and 2 are operated in accordance with the emissions limitation of Specific Condition No. B.2, in lieu of stack testing, visible emissions (VE) from Pellet Mill Systems Nos. 1 and 2 cyclone dust collector exhaust vents shall not exceed five percent (5%) opacity. Submittal of a visible emissions test showing visible emissions of no greater than 5% opacity will be accepted as documentation of compliance with the particulate matter emission limits of this permit. However, should the Department have reason to believe the particulate emission standard is not being met, the Department may require that compliance with the particulate emission standard be demonstrated by stack testing in accordance with Chapter 62-297, F.A.C.
[Rules 62-4.070(3) and 62-210.650 (Circumvention), F.A.C.]

## COMPLIANCE TESTING REQUIREMENTS

**B.4.** Initial Visible Emissions (VE) Compliance Tests *(for EU ID No. 005 only)* - In order to determine initial compliance with the visible emission limitation of Specific Condition No. B.3, the Pellet Mill System No. 2 cyclone dust collector vents exhaust shall be tested no later than 60 days after initial operation of the unit with the new cyclone*.

*(*Permitting Note – See Specific Condition No. B.7. for start of operation notification requirements.)*

[Rules 62-4.070(3) and 62-297.310(7)(a)1., F.A.C.]

**B.5.** Annual Visible Emissions (VE) Compliance Testing – In order to determine compliance with the visible emission limitations of Specific Condition No. B.3, the Pellet Mill Systems Nos. 1 and 2 cyclone dust collector exhaust vents shall each be tested for visible emissions annually each federal fiscal year (October 1- September 30). [Rule 62-297.310(7)(a)4, F.A.C.]

**B.6.** Operating Rate During Testing - Testing of emissions shall be conducted with the emissions unit operating at permitted capacity. For the purposes of testing, the permitted capacity is defined as 90 to 100 percent of the maximum operation rate of 40 tons per hour (combined) during the test period. If it is impractical to test at permitted capacity, an emissions unit may be tested at less than the maximum permitted capacity; in this case, subsequent emissions unit operating rate is limited to 110 percent of the test rate (on a daily average basis)* until a new test is conducted. Once the unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity.

(**Permitting Note – See Specific Condition No. B.9. for associated daily operating rate record keeping requirements.*)

[Rule 62-297.310(2), F.A.C.]

## NOTIFICATION REQUIREMENTS

**B.7.** Notification of Operation Commencement - The permittee shall notify the Compliance Authority in writing of the date of commencing operation of the Pellet Mill System No. 2 after completing replacement of the cyclone dust collector*. This notification shall be submitted no later than fifteen (15) days after that date. Commencing operation means setting into operation of any emissions unit for any purpose.

*(*Permitting Note – See Specific Condition No. B.4. for initial testing requirements.)*

[Rules 62-4.070, and 62-210.200, F.A.C., (definition of Commence Operation)]

**RECORDKEEPING REQUIREMENTS**

**B.8.** Monthly Pellet Mill Systems Throughput Rate Records - In order to document continued compliance with Specific Condition No. B. 1, the facility shall maintain the following monthly records:

a. month and year of record;

b. the total quantity, in tons, of combined total materials processed through Pellet Mill Systems Nos. 1 and 2 for the month; and

c. the most recent consecutive 12-month combined total, in tons, of materials processed through Pellet Mill Systems Nos. 1 and 2.

All records shall include the Facility ID on each page. Monthly logs shall be completed within fifteen (15) days of the end of the month.
[Rule 62-4.070(3), F.A.C.]

**B.9.** Daily Operating Rate Recordkeeping – If compliance testing is conducted at less than 90 -100% of permitted capacity such that a new lower operating limit is established (*see Specific Condition No. B.6.*), then the permittee shall keep the following daily operating records for the Dry Material Grinding System:

a. date of record and Emission Unit ID (i.e. EU No. 004, 005);

b. combined total tons material processed through Pellet Mill System Nos. 1 and 2 for the day (tons/day);

c. hours of operation* for Pellet Mill System Nos. 1 and 2 for the day (hours/day); and

*(* Note – hours of operation are defined as any period that either or both Pellet Mills are in operation.)*

d. calculation of average tons per day processing rate based upon b. and c. above.

[Rule 62-4.070(3), F.A.C.]

## C. EU No. 007- Mineral Unloading System

This section of the permit addresses the following emissions unit (EU).

| EU ID No. | Emissions Unit Description |
|---|---|
| 007 | Mineral Unloading System (with baghouse dust collector) - Minerals (salt, calcium, urea, and minugel, or other minerals as required) are delivered to the facility by trucks and unloaded using the trucks' pneumatic systems to blow the minerals to a pneumatic filter receiver and into any one of four storage bins. Particulate matter (PM) emissions are controlled by a MAC Model No. 74RT14III baghouse dust collector. |

**ADDITIONAL REQUIREMENTS**- SEE ALSO SECTION 3, SUBSECTION E. FOR COMMON CONDITIONS THAT APPLY TO THIS EMISSIONS UNIT**.**

### EMISSIONS STANDARDS

**C.1.** Particulate Matter (PM) Emissions Limitation - PM emission from the Mineral Unloading System baghouse dust collector exhaust vent shall not exceed 0.20 pounds per hour.

*(Permitting Note –Based upon this limit and operating for 8,760 hours/year, potential PM emissions for this EU are 0.88 TPY.)*

[Rule 62-210.200 (definition of Potential to Emit), F.A.C.]

**C.2.** Visible Emissions - In order to provide reasonable assurance that the Mineral Unloading System is operated in accordance with the emissions limitation of Specific Condition C.1, in lieu of stack testing, visible emissions (VE) from the Mineral Unloading System dust collector exhaust vent shall not exceed five percent (5%) opacity. Submittal of a visible emissions test showing visible emissions of no greater than 5% opacity will be accepted as documentation of compliance with the particulate matter emission limits of this permit. However, should the Department have reason to believe the particulate emission standard is not being met, the Department may require that compliance with the particulate emission standard be demonstrated by stack testing in accordance with Chapter 62-297,F.A.C.
[Rules 62-4.070(3) and 62-297.620(4), F.A.C.]

### COMPLIANCE TESTING REQUIREMENTS

**C.3.** Annual Visible Emissions (VE) Compliance Testing – In order to determine compliance with the visible emission limitation of Specific Condition No. C.2, the Mineral Unloading System baghouse dust collector exhaust vent shall be tested for visible emissions annually each federal fiscal year (October 1-September 30).
[Rule 62-297.310(7)(a)4, F.A.C.]

**C.4.** Operating Rate During Testing - Testing of emissions shall be conducted with the emissions unit operating at permitted capacity. For the purposes of testing, the permitted capacity is defined as 90 to 100 percent of the maximum operation rate of 12.0 tons per hour during the test period. If it is impractical to test at permitted capacity, an emissions unit may be tested at less than the maximum permitted capacity; in this case, subsequent emissions unit operating rate is limited to 110 percent of the test rate (on a daily average basis)* until a new test is conducted. Once the unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of

**C.4.** *(continued)*

additional compliance testing to regain the authority to operate at the permitted capacity.

(**Permitting Note* – *See Specific Condition No. C.5. for associated daily operating rate record keeping requirements.*)

[Rule 62-297.310(2), F.A.C.]

**RECORDKEEPING REQUIREMENTS**

**C.5.** Daily Operating Rate Recordkeeping – If compliance testing is conducted at less than 90 -100% of permitted capacity such that a new lower operating limit is established (*see Specific Condition No. C.4.*), then the permittee shall keep the following daily operating records for the Dry Material Grinding System:

a. date of record and Emission Unit ID (i.e. EU No. 007);

b. tons material processed through the Mineral Unloading System for the day (tons/day);

c. hours of operation for the Mineral Unloading System for the day (hours/day); and

d. calculation of average tons per day processing rate based upon b. and c. above.

[Rule 62-4.070(3), F.A.C.]

## D. EU No. 008- Grain Cleaning System

This section of the permit addresses the following emissions unit (EU).

| EU ID No. | Emissions Unit Description |
|---|---|
| 008 | Grain Cleaning System (with baghouse dust collector) - Whole corn, cracked corn, oats and barley are cleaned by first moving the materials through the pre-aspirated air in order to remove light materials such as hulls, immatures, and chaff cobbs (this material is deposited into a settling chamber and subsequently conveyed to the cull system). After moving through the pre-aspirated air system, the materials move through various scalp screens to remove oversized materials from the grains. Finally, the materials are moved through the post-aspirated air system for further removal of light materials such as dust. Particulate emissions are controlled by a Donaldson Torit/Day Model No. DFO3-12 dust collector. |

**ADDITIONAL REQUIREMENTS**- SEE ALSO SECTION 3, SUBSECTION E. FOR COMMON CONDITIONS THAT APPLY TO THIS EMISSIONS UNIT**.**

### EMISSIONS STANDARDS

**D.1.** Visible Emissions - In order to provide reasonable assurance that the air pollution control equipment for the grain cleaning system is operating properly, visible emissions (VE) from the Grain Cleaning System baghouse dust collector exhaust vent shall not exceed five percent (5%) opacity. Submittal of a visible emissions test showing visible emissions of no greater than 5% opacity will be accepted as documentation of compliance with the particulate matter emission limits of this permit.
[Rules 62-4.070(3) and 62-210.650 (Circumvention), F.A.C.]

### COMPLIANCE TESTING REQUIREMENTS

**D.2.** Annual Visible Emissions (VE) Compliance Testing – In order to determine compliance with the visible emission limitation of Specific Condition No. D.1, the Grain Cleaning System baghouse dust collector exhaust vent shall be tested for visible emissions annually each federal fiscal year (October 1-September 30).
[Rule 62-297.310(7)(a)4, F.A.C.]

**D.3.** Operating Rate During Testing - Testing of emissions shall be conducted with the emissions unit operating at permitted capacity. For the purposes of testing, the permitted capacity is defined as 90 to 100 percent of the maximum operation rate of 27.5 tons per hour during the test period. If it is practical to test at permitted capacity, an emissions unit may be tested at less than the maximum permitted capacity; in this case, subsequent emissions unit operating rate is limited to 110 percent of the test rate (on a daily average basis)* until a new test is conducted. Once the unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity.

(**Permitting Note* – *See Specific Condition No. D.4. for associated daily operating rate record keeping requirements.*)

[Rule 62-297.310(2), F.A.C.]

**RECORDKEEPING REQUIREMENTS**

**D.4.** Daily Operating Rate Recordkeeping – If compliance testing is conducted at less than 90 -100% of permitted capacity such that a new lower operating limit is established (*see Specific Condition No. D.3.*), then the permittee shall keep the following daily operating records for the Dry Material Grinding System:

a. date of record and Emission Unit ID (i.e. EU No. 008);

b. tons material processed through the Grain Cleaning System for the day (tons/day);

c. hours of operation for the Grain Cleaning System for the day (hours/day); and

d. calculation of average tons per day processing rate based upon b. and c. above.

[Rule 62-4.070(3), F.A.C.]

## E. Emissions Unit Common Conditions

This section of the permit addresses specific conditions that are common to the following emissions units (EUs).

| EU ID No. | Emissions Unit Description |
|---|---|
| 003 | Dry Material Grinding System (with baghouse dust collector) |
| 004 | Pellet System No. 1 (with cyclone dust collector) |
| 005 | Pellet System No. 2 (with cyclone dust collector) |
| 007 | Mineral Unloading System (with baghouse dust collector) |
| 008 | Grain Cleaning System (with baghouse dust collector) |

### COMPLIANCE TESTING REQUIREMENTS

**E.1.** Compliance Test Requirements - Compliance tests shall be conducted in accordance with the applicable requirements specified in Appendix D (Common Testing Requirements) of this permit.
[Rule 62-297.310, F.A.C.]

**E.2.** Compliance Test Method - Required compliance tests shall be performed in accordance with the following reference method.

| Method | Description of Method and Comments |
|---|---|
| 9 | Visual Determination of the Opacity of Emissions from Stationary Sources –<br>The test observation period shall be for a minimum of thirty (30) minutes, and shall include the period during which the highest opacity emissions can reasonably be expected to occur (i.e. during operation using the dustiest material). |

The above method is described in Appendix A of 40 CFR 60 and is adopted by reference in Rule 62-204.800, F.A.C. No other methods may be used unless prior written approval is received from the Department.
[Rules 62-204.800 and 62-297.401, F.A.C.; Appendix A of 40 CFR 60]

### NOTIFICATION REQUIREMENTS

**E.3.** Test Notification - The permittee shall notify the Compliance Authority in writing at least 15 days prior to any required tests. The notification must include the following information: the date, time, and location of each test; the name and telephone number of the facility's contact person who will be responsible for coordinating the test; and the name, company, and the telephone number of the person conducting the test.

(*Permitting Note - The notification should also include the relevant emission unit ID No(s)., test method(s) to be used, and pollutants to be tested.*)

[Rules 62-4.070(3) and 62-297.310(7)(a)9., F.A.C.]

## RECORDKEEPING AND REPORTING REQUIREMENTS

**E.4.** Records Retention - All records required by this permit shall be maintained at the facility for a minimum of the most recent three (3) year period and be made available to the Department upon request. [Rule 62-4.070(3), F.A.C.]

**E.5.** Compliance Test Reports - The permittee shall prepare and submit reports for all required compliance tests in accordance with the requirements specified in Appendix D (Common Testing Requirements) of this permit. Include process rates (in tons/hour) for each emissions unit during the test period with reports. Failure to submit the actual loading rate for the test period may invalidate the test and fail to provide reasonable assurance of compliance. [Rule 62-297.310(8), F.A.C.]

## OPERATION AND MAINTENANCE PLAN REQUIREMENTS

**E.6.** Operation and Maintenance (O & M) Plan for PM Control – In order to provide reasonable assurance that the emission control devices (cyclone and baghouse dust collectors) are being operated and maintained properly, the facility shall maintain and follow an O&M Plan for each air pollution control device at the facility. The O&M Plan shall include, at a minimum, the following information for each air pollution control device:

a. the pollution control device operating parameters necessary to verify correct operation of the control device (e.g. baghouse pressure drop, etc.);

b. schedule for the routine maintenance of the pollution control device as specified by the manufacturer;

c. schedule for routine observations of the pollution control device sufficient to ensure proper operation; and

d. A list of the type and quantity of the required spare parts for the pollution control device which are stored on the premises of the permittee.

The O&M Plan shall be retained onsite at all times. Any alterations to the O&M Plan shall be submitted to the Air Permitting Section of the Department's Southwest District Office for inclusion as an attachment to the facility's Operation Permit.
[Rules 62-4.070(3) and 62-210.650 (Circumvention), F.A.C.; as previously established in Construction Permit No. 1050157-008-AC]

**E.7.** Operation and Maintenance (O&M) Log – The permittee shall establish and maintain an O&M Log. This Log shall include, at a minimum, the following information:

a. When maintenance and observations were performed (Date and Time);

b. What maintenance and observations were performed;

c. Who performed the maintenance and observations [Name of Person(s)]; and

d. Acceptable parameter ranges for each operational check.

O&M Logs shall be retained onsite for a minimum of the most recent three (3) year period.
[Rules 62-4.070(3) and 62-210.650 (Circumvention), F.A.C.; as previously established in Construction Permit No. 1050157-008-AC]