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

April 5, 2013

FINAL PERMIT

PERMITTEE

Lakeland Animal Nutrition, Inc.
2801 South Combee Road
Lakeland, Florida 33802

Air Permit No. 1050365-007-AO
Permit Expires: 09/26/2013
Lakeland Animal Nutrition – Eaton Park Facility
Air Operation Permit Revision

Authorized Representative:
Mr. William L. Jackson III, President

This is the final air operation permit to revise Air Operation Permit No. 1050365-005-AF and incorporate Air Construction Permit No. 1050365-006-AC for an animal feed processing plant at Lakeland Animal Nutrition, Inc. categorized under Standard Industrial Code No. 2048. The existing facility is located in Polk County at 2801 South Combee Road in Lakeland, Florida. The UTM coordinates are Zone 17, 410.7 kilometers (km) East, and 3098.8 km North.

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.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of final permit. Petitions filed by any persons other than those entitled to written notice under section 120.60(3) of the Florida Statutes must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of final permit, whichever occurs first. Under section 120.60(3), however, any person who asked the Department for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under sections 120.569 and 120.57 F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with rule 28-106.205 of the Florida Administrative Code.

All petitions filed under these rules shall contain:

(a) The name and address of each agency affected and each agency's file or identification number, if known;
(b) The name, address, and telephone number of the petitioner; the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination;
(c) A statement of when and how the petitioner received notice of the agency decision;
(d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate;
(e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action;
(f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action, including an explanation of how the alleged facts relate to the specific rules or statutes; and
(g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by rule 28-106.301 of the Florida Administrative Code.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation is not available in this proceeding.

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, 3900 Commonwealth Boulevard, Mail Station #35, 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 thirty days after this order is filed with the clerk of the Department.

Executed in Hillsborough County, Florida

Kelley M Boatwright 04/04/2013

Kelley M. Boatwright 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 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. Galen J. Nicolette, Lakeland Animal Nutrition, nick@lanfeeds.com

Ms. Lynn Robinson, P.E., Southern Environmental Sciences, lrobinson@sesfla.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.

Cerna Bratty April 5, 2013
(Clerk) (Date)

FACILITY AND PROJECT DESCRIPTION

Lakeland Animal Nutrition, Inc. operates an existing animal feed processing plant, which produces feed and feed nutrients for animals and fowls with the exception of dogs and cats. The facility has two regulated pellet mills, as well as other associated exempt activities.

The facility receives raw materials (primarily corn and oats) by means of railcars and trucks. The raw material is gravity unloaded and transferred by screw conveyors where the raw material is cleaned and screened and placed in grain storage silos and bins. Feed materials, including grains and molasses, are mixed and the resulting mash is transferred by the conveyors to the process bins or into two pellet mills where feed pellets are formed with the addition of steam. Process steam is provided by a natural gas fired boiler with a maximum heat input rating of less than 10 Million British thermal units (MMBtu)/hour. After the pellets have completed the steam process, the pellets are air cooled and transferred mechanically to product bins. From the product bins, the feed pellets are gravity fed to either a bagging operation inside the building or to a truck loading operation by telescoping tubes.

Emissions of particulate matter are controlled by cyclone dust collectors.

The existing facility consists of the following emissions units (EUs).

Facility ID No. 1050365

EU ID No.	Emission Unit Description
002	Big Pellet Mill
004	Small Pellet Mill

Exempt Emission Units/Activities

The following emission sources at this facility are from permitting in accordance with the provisions of Rule 62-210.300(3)(b), F.A.C. (Generic Emissions Unit or Activity Exemption) due to their low potential air pollution emissions:

- Screening/sizing operations in an enclosed area operated at approximately 4 tons per hour. *(This operation was previously permitted as EU No. 001 - Grain Cleaner.)*
- Hammer mill which processes corn at a maximum rate of approximately 1.5 tons/hour. . It typically operates 20 hour/week. The milled product is transferred pneumatically to storage bins. Particulate matter emissions are controlled by a cyclone. However, the pre-control emissions are estimated at less than 3 tons per year. *(This activity was previously permitted as EU No. 003 - Hammer mill.)*
- Railcar and truck raw material unloading (gravity feed);
- raw material transfer screw conveyors;
- corn cracker (crimper roller);
- product bagging operation inside the building; and
- product truck loading (gravity feed through canvas tube).

The following emission source at this facility is exempt from permitting in accordance with Rule 62-210.300(3)(a)33., F.A.C. (Categorical and Conditional Exemptions):

- One natural gas fired process steam boiler with a maximum heat input of less than 10 MMBtu/hour.

FACILITY REGULATORY CLASSIFICATION

- The existing facility is not a major source of hazardous air pollutants (HAPs).
- The existing facility has no units subject to the acid rain provisions of the Clean Air Act (CAA).
- The existing facility is not a Title V major source of air pollution in accordance with Chapter 62-213, F.A.C.
- The existing facility is not a major stationary source of air pollution pursuant to Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.
- The existing facility is a synthetic non-Title V source for the pollutant particulate matter with a mean particle diameter of 10 microns or less (PM_{10}). The emission limitations, restriction on hours of operation, the use of cyclones, and restriction on the amount of material produced in this permit will ensure that the facility's PM_{10} emissions will be below the threshold for a Title V source.
- The existing facility is subject to 40 Code of Federal Regulations (CFR) 63, Subpart DDDDDDD – National Emission Standards for Hazardous Air Pollutants for Area Sources: Prepared Feeds Manufacturing. The State of Florida has not adopted this regulation as of effective date of this permit.

PERMIT HISTORY/AFFECTED PERMITS

This permit replaces Air Operation Permit No. 1050365-005-AF, and incorporates the terms and conditions of Air Construction Permit 1050365-006-AC.

ADMINISTRATIVE REQUIREMENTS

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

Florida Department of Environmental Protection
Southwest District Office
Air Resource Management Section
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 and Enforcement Section - Attention: AIR. The mailing address and phone number is:

Florida Department of Environmental Protection
Southwest District Office
Compliance and Enforcement Section – Attention: 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. Operation Permit Renewal Application - A completed application for renewal of the operation permit shall be submitted to the Permitting Authority no later than 60 days prior to the expiration date of this operation permit. To properly apply for an operation permit, 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.; and

c. copies of the most recent month of records/logs specified in Specific Condition No. A.10.

[Rules 62-4.030, 62-4.050, 62-4.070(3), 62-4.090, 62-210.300(2), and 62-210.900, F.A.C.]

FACILITY-WIDE REQUIREMENTS

9. Unconfined Emissions of Particulate Matter - All reasonable precautions shall be taken to prevent and control generation of unconfined emissions of particulate matter in accordance with the provisions in Rule 62-296.320(4)(c), F.A.C. (See Appendix C, Condition No. 9). These provisions are applicable to any source, including but not limited to, industrial related activities such as loading, unloading, storing and handling of materials. These provisions shall include the following:

a. truck and railcar unloading of incoming raw materials shall be done in enclosed areas;

b. doors shall be shut when screening/sizing equipment is in operation on the screening floor; and

c. truck loading of product shall be done by gravity feed through a canvas tube.

[Rule 62-296.320(4)(c), F.A.C.; Construction Permit 1050365-006-AC]

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

EU ID Nos.	Emission Unit Description
002 & 004	Feed materials, including grains and molasses, are mixed and the resulting mash is transferred by the conveyors to two pellet mills (Big Pellet Mill (EU No. 002) and Small Pellet Mill (EU No. 004)), where feed pellets are formed with the addition of steam. After the pellets have completed the steam process, the pellets are air cooled and transferred mechanically to product bins. The maximum feed production rate (output)for the Big Pellet Mill (EU No. 002) is 8 tons/hour (daily average). Particulate matter emissions from this mill are controlled by two cyclones (in parallel) exhausting to the atmosphere through a common discharge stack. The maximum feed production rate (output) from the Small Pellet Mill (EU No. 004) is 5 tons/hour (daily average). Particulate matter emissions from this mill are controlled by a custom fabricated cyclone with a design airflow rate of approximately 5,000 actual cubic feet per minute (acfm).

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

SPECIFIC CONDITIONS

PERFORMANCE RESTRICTIONS

A.1. Permitted Capacity - The emissions units shall comply with the following.

a. The maximum feed production rate (output) of the Big Pellet Mill (EU No. 002) shall not exceed 8 tons/ hour, based on a daily average*.

b. The maximum feed production rate (output) of the Small Pellet Mill (EU No. 004) shall not exceed 5 tons/ hour, based on a daily average*.

c. The maximum combined feed production rate (output) of the Big Pellet Mill and the Small Pellet Mill (EU Nos. 002 and 004) shall not exceed 52,560 tons of feed products per any consecutive 12-month period.

(Permitting Note - See Appendix D, Condition 1, for Operation Rate during Testing requirements which could establish lower maximum permitted feed production rates.)*

[Rule 62-210.200 (Potential to Emit), F.A.C.; Construction Permit 1050365-006-AC]

A.2. Restricted Operation - Each of the two pellet mills is limited to a maximum of 6,570 hours per any consecutive 12-month period. Each pellet mill typically operates 32 - 40 hours/week.
[Rules 62-4.070(3) and 62-210.200 (Potential to Emit), F.A.C.; Construction Permit 1050365-006-AC]

EMISSIONS STANDARDS

A.3. General Particulate Matter Emission Limiting Standards (Process Weight Table Rule) - The maximum total particulate matter (PM) emission rates from each of the pellet mill cyclone exhaust stacks shall not exceed an allowable rate as determined by the applicable Rule 62-296.320(4)(a)2., F.A.C., Process Weight Table equation *(see below)*. The maximum allowable PM emission rates based on the maximum process rates of the two pellet mills are shown in the table below.

EU No.	EU Description	Maximum Process Rate (daily average)	Allowable PM missions
002	Big Pellet Mill	8.0 tons/hour	13.03 lbs/hour
004	Small Pellet Mill	5.0 tons/hour	9.74 lbs/hour

The allowable emission rates at lesser process rates shall be determined from the formula below:

$E = 3.59P^{0.62}$

where E = emissions in pounds per hour (lbs/hour), and

P = process weight rate in tons per hour*

(Permitting Note - In this case, the daily production rate of feed products per pellet mill is used to determine the process weight rate "P". See Specific Condition No. A.10. for associated recordkeeping requirements.)*

[Rule 62-296.320(4)(a), F.A.C.; Construction Permit 1050365-006-AC]

A.4. Cyclone Exhaust Visible Emissions (VE) Standard - In order to provide reasonable assurance that the cyclones are operating properly and being properly maintained, visible emissions from the pellet mill cyclone stacks (EU Nos. 002 and 004) shall not exceed 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 limit of Specific Condition No. A.3. However, should the Department have reason to believe that a 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 62-297.310(7)(b), F.A.C.; Construction Permit 1050365-006-AC]

COMPLIANCE TESTING REQUIREMENTS

A.5. Visible Emissions (VE) Compliance Tests - During each federal fiscal year (October 1st to September 30th), each of the two pellet mill cyclone exhausts shall be tested to demonstrate compliance with the visible emissions standard of Specific Condition No. A.4.
[Rule 62-297.310, F.A.C.]

A.6. Compliance Test Requirements - Tests shall be conducted in accordance with the applicable requirements specified in Appendix D (Common Testing Requirements) of this permit.

(Permitting Note - See Appendix D, Condition 1, for Operation Rate during Testing requirements.)

[Rule 62-297.310, F.A.C.]

A.7. Compliance Test Method - Required tests shall be performed in accordance with the following reference method(s).

Method	Description of Method and Comments
9	Visual Determination of the Opacity of Emissions from Stationary Sources

The above method is described in Appendix A of 40 CFR 60 and are 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.
[Rule 62-204.800, F.A.C.; and Appendix A of 40 CFR 60]

NOTIFICATION REQUIREMENTS

A.8. 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

A.9. Test Reports - The permittee shall prepare and submit reports for all required tests in accordance with the requirements specified in Appendix D (Common Testing Requirements) of this permit. The test reports shall include:

a. the actual pellet mill feed production rate (output) during the test period; and

b. a copy of the daily operation records for the test day as required by Specific Condition No. A.10.

[Rules 62-4.070(3) and 62-297.310(8), F.A.C.; Construction Permit 1050365-006-AC]

A.10. Operation Records - In order to document compliance with Specific Condition Nos. A.1. and A.2., the permittee shall maintain daily and monthly records. At a minimum, the records shall contain the following:

Daily Records

a. Facility Name, Facility ID (1050365), Emission Unit (EU) No. and description (e.g., EU No. 002 – Big Pellet Mill);

b. date (Month/Day/Year);

c. tons of feed products from the big pellet mill;

(continued)

A.10. *(continued)*

d. the big pellet mill hours of operation;

e. tons of feed products from the small pellet mill;

f. the small pellet mill hours of operation;

g. daily average feed production rate of the big pellet mill in tons/hour., calculated from c. and d. above; and

h. daily average feed production rate of the small pellet mill in tons/hour., calculated from e. and f. above (tons/hour);

Monthly Records

i. Facility Name, Facility ID (1050365);

j. month and year;

k. total production of animal feed from the facility for the month in tons;

l. total production of animal feed for the most recent consecutive 12-month period ending with the month of record (tons per consecutiver12-month period);

m. total hours of operation of the big pellet mill for the most recent consecutive 12-month period; and

n. total hours of operation of the small pellet mill for the most recent consecutive 12-month period.

Daily records shall be completed within 10 business days and monthly records shall be completed within 15 days after the end of each month. These records shall be recorded in a permanent form suitable for inspection by the Department upon request, and shall be retained at the facility for at least a three year period.
[Rule 62-4.070(3), F.A.C.; Construction Permit 1050365-006-AC]