## PERMITTEE

Pilgrim's Pride Corporation of Georgia, Inc.
463 Weyanoke Dr
Evans, GA 30809

## PERMITTING AUTHORITY

Florida Department of Environmental Protection
Waste and Air Resource Management Program
Northeast District Office
8800 Baymeadows Way West, Suite 100
Jacksonville, Florida 32256

## PROJECT

Air Permit No. 1210018-014-AC
Air Construction Permit

This air construction permit authorizes facility wide changes including the removal of Emission Unit (EU) No. 003 (500 HP Steam Boiler), removal of EU 004 (rendering system with odor control scrubber), after the fact permitting of the new water heater (24.354 MMBtu/hr), updating of the capacity and rule applicability for EU No. 005 (Steam Generating Boiler No. 4), and EU No. 008 (Steam Generating Boiler No. 5), removal of fuel oil as an allowed fuel for the water heater and the two remaining boilers (EU 005 and EU 007), and establishment of a facility wide cap for oxides of nitrogen requested by the applicant.

This permitting action affects the Pilgrim's Pride Corporation of Georgia, Inc. Live Oak poultry processing facility (Standard Industrial Classification No. 2048). The facility is located in Suwannee County at 19470 US Highway 90, Live Oak, Florida 32060. The UTM coordinates are Zone 17, 292.69 km East, and 3362.07 km North.

## NOTICE AND PUBLICATION

The Department issued a Draft Air Construction Permit (draft permit) package on December 31, 2013. Subsequent to its issuance, it was determined that the adjacent Blue Earth, Inc. co-generation facility authorized name according to the Florida Department of State is Live Oak Heat & Power, LLC. Therefore the Department, through its permitting authority, withdrew the draft permit package issued on December 31, 2013, and replaced it with a new draft permit package on January 14, 2014. The applicant published the Public Notice in The Suwannee Democrat on January 17, 2014. The Department received the proof of publication on January 17, 2014. No requests for administrative hearings or requests for extensions of time to file a petition for administrative hearing were received.

## COMMENTS

**A. Comments were received from Mr. Stephen James, Southeast Director, Environmental Engineering, Pilgrim's Pride Corporation of Georgia, Inc., on January 30, 2014. The comments and Department responses are summarized below:**

1. Section 1, Facility and Project Description, Proposed Project (page 3 of 17):

| **Facility ID No. 1210018** | |
|---|---|
| **ID No.** | **Emission Unit Description** |
| 003 | 500 HP Steam Boiler No. 3 (removed) |
| 004 | Rendering system w/ an odor control scrubber (permanently shutdown) |
| 005 | ~~500~~ 800 HP Steam Boiler No. 4 |
| 006 | Anaerobic Lagoon Biogas Flare |
| 007 | ~~500~~ 600 HP Steam Boiler No. 5 |
| 008 | Water Heater (previously unpermitted) |

Justification: The table lists incorrect unit descriptions for Boiler Nos. 4 and 5. Boiler No. 4 should be listed as 800HP and Boiler No. 5 should be listed as 600HP. Emission Unit Descriptions from Section 3 of the permit also support the revised boiler capacities (see pages 9 and 12 of the draft permit).

*Department response: Based on the comment, the language in the table under the Proposed Project description is revised in the final permit as follows:*

**Proposed Project**

This project will add, affect, and/or modify the following emissions unit(s):

| **Facility ID No. 1210018** | |
|---|---|
| **ID No.** | **Emission Unit Description** |
| 003 | 500 HP Steam Boiler No. 3 (removed) |
| 004 | Rendering system w/ an odor control scrubber (permanently shutdown) |
| 005 | ~~500~~ HP Steam Boiler No. 4 (capacity updated by this permit to 800 HP) |
| 006 | Anaerobic Lagoon Biogas Flare |
| 007 | ~~500~~ HP Steam Boiler No. 5 (capacity updated by this permit to 600 HP) |
| 008 | Water Heater (previously unpermitted) |

2. Section 3, EU No. 005, Permit Condition 6 (page l0 of l7):

~~Initial testing shall be conducted for a minimum period of one hour. Initial testing shall be conducted within 180 days of issuance of this air construction permit.~~ Opacity testing shall be conducted upon Department request.

Justification: Pilgrim's Pride believes initial performance testing is unnecessary since compliance will be maintained with the opacity emissions standard (Permit Condition 5a) by burning natural gas (no fuel oil will be fired).

*Department response: The boiler is subject to the visible emissions standard in Rule 62-296.406(1), F.A.C. Pursuant to Rule 62-297.310(7)(a), F.A.C. a compliance test that demonstrates compliance with the applicable emission limiting standard is to be conducted prior to obtaining an operation permit for the emissions unit. The subsequent compliance test frequency is determined according to Rules 62-297.310(7)(a)3. and 4., F.A.C., and will be done at the time of the operation permit. No change is made to the permit condition in the final permit as a result of the comment.*

3. Section 3, EU No. 005, Permit Condition 8 (page 10 of 17):

An initial performance test using EPA Method 7,7A, 7E of 40 CFR 60 Appendix A, or other applicable DEP approved reference methods, shall be conducted not later than 180 days after the issuance of this permit. Alternatively, vendor-certified emission factors or U.S. EPA literature emission factors (e.g." AP-42) may, be used in lieu of initial performance testing to demonstrate compliance. Subsequent performance tests shall be conducted upon Department request in accordance with Rule 62- 297.310(7)(b), F.A.C. See section 2.B, Facility - Wide Conditions.

Justification: Pilgrim's Pride respectfully requests the use of vendor-certified emission factors or U.S. EPA literature emission factors as an alternate means of demonstrating compliance with this permit condition. Pilgrim's Pride is not claiming a lower NOx emission factor than is published in AP-42.

*Department response: The facility requested a facility-wide $NO_x$ emissions cap to avoid classification as a Title V Major source. As such, the Department requires in the permit that an initial $NO_x$ emissions test of Boiler No. 4 be conducted. An actual emission factor (lb $NO_x$/MMscf) will be determined from the test results which will be used for Boiler No. 5, the hot water heater, and other facility heaters for demonstrating compliance with the facility-wide $NO_x$ emissions cap (Section 2.B., Facility-wide Conditions, Condition No. 1). An initial $NO_x$ emissions test is not being required of Boiler No. 5, the hot water heater, and other facility heaters. No change is made to the permit condition in the final permit as a result of the comment.*

4. Section 3, EU No. 007, Permit Condition 6 (page 13 of 17):

~~Initial testing shall be conducted for a minimum period of one hour. Initial testing shall be conducted within 180 days of issuance of this air construction permit.~~ Opacity testing shall be conducted upon Department request.

Justification: Pilgrim's Pride believes initial performance testing is unnecessary since compliance will be maintained with the opacity emissions standard (Permit Condition 5a) by burning natural gas (no fuel oil will be fired).

*Department response: The boiler is subject to the visible emissions standard in Rule 62-296.406(1), F.A.C. Pursuant to Rule 62-297.310(7)(a), F.A.C. a compliance test that demonstrates compliance with the applicable emission limiting standard is to be conducted prior to obtaining an operation permit for the emissions unit. The subsequent compliance test frequency is determined according to Rules 62-297.310(7)(a)3. and 4., F.A.C., and will be done at the time of the operation permit. No change is made to the permit condition in the final permit as a result of the comment.*

5. Section 3, EU No. 008, Emission Unit Description (page l5 of 17):

| ID No. | Emission Unit Description |
|---|---|
| 008 | Water Heater (Kemco Boiler: 24.35 MMBtu/hr , constructed in 2010) fired by Natural Gas. -- The boiler is subject to 40 CFR 60, Subpart Dc, Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units ~~and~~ 40 CFR 60, Subpart A, General Provisions, and Rule 62-296.406, F.A.C., Fossil Fuel Steam Generators with Less Than 250 Million Btu Per Hour Heat Input, New and Existing Emissions Units. Additional restrictions have been added to avoid classification as a Title V Facility and as a Major Source. The unit only heats water and does not generate steam. |

Justification: The Water Heater EU No. 008) should be listed as subject to Rule 62-296.406, F.A.C. Boiler Nos. 4 and 5 are correctly listed as being subject to Rule 62-296.406 in the draft permit.

*Department response: In the Department Request For Additional Information dated November 4, 2013, confirmation was requested as to whether the Kemco water heater generates steam or only hot water. It was confirmed in the response dated December 1, 2013 that the Kemco water heater only generates hot water and not steam.*

*By generating hot water only, the boiler does not meet the Rule 62-210.200(129), F.A.C. definition of a Fossil Fuel Steam Generating Unit. As such, it is not subject to Rule 62-296.406, F.A.C.*

*Rule 62-210.200(129), F.A.C.: "Fossil Fuel Steam Generators" – A furnace or boiler which produces steam by combustion of oil, coal, or gas of fossil origin.*

*No change is made to the final permit as a result of the comment.*

6. Section 3, EU No. 006, Permit Condition 3 (page 17 of l7):

Authorized Fuel: Fuels shall be limited to biogas generated by the anaerobic lagoon and natural gas (used for start-up purposes only).

Justification: The flare has a natural gas starter. Emissions from the starter are assumed to be Negligible.

*Department response: Based on the comment, Section 3, EU No. 006, Permit Condition 2. is revised as requested in the final permit.*

**No comments on the Draft Permit were received from the public.**

## CONCLUSION

The final action is to issue the permit with the minor changes, corrections and clarifications as described above.