April 18, 2011

CERTIFIED MAIL NO. 7008 1830 0002 8175 3337
RETURN RECEIPT REQUESTED

PERMITTEE

USDA APHIS – Miami Import Center
P.O. Box 660657
Miami Springs, FL 33266

Authorized Representative:
Dr. Elizabeth A. Enciso, Director

Air Permit No. 0250390-007-AC
Permit Expires: April 17, 2012

USDA APHIS – Miami Import Center
Minor Source Air Construction Permit
Project: Installation of Two (2) Incinerators

This is the final air construction permit No. 0250390-007-AC, which authorizes the installation of two (2) incinerators. The proposed work will be conducted at USDA APHIS – Miami Import Center, a biological waste incineration and animal crematory facility (SIC/NAICS # - 4953 & 9641/562213 & 92614). This facility is located in Miami-Dade County at 6300 NW 36 Street, Miami, FL 33122.

The Lat./Long. coordinates are 25° 48' 37" N / 80° 17' 87" W.

This final permit is organized by the following sections.

Section 1. General Information

Section 2. Administrative Requirements

Section 3. Emissions Unit Specific Conditions

Section 4. Appendices

Because of 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 construction 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 Miami-Dade County Department of Environmental Resources Management (DERM), Air Quality Management Division.

Executed in Miami, Florida

_____ _____

H. Patrick Wong, Chief (Date)
Air Quality Management Division

HPW/aj

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Determination and Final Permit) was sent by certified U.S. mail and/or 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 _____ to the persons listed below.

Douglass Bauman, P.E., General Civil & Environmental Engineering LLC, 5305 Pineview Way, Apopka, FL 32703
(doug4ucf@earthlink.net)

Lennon Anderson, P.E., Florida Department of Environmental Protection, Southeast District Office (Lennon.Anderson@dep.state.fl.us)

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.

_____ _____

(Clerk) (Date)

FACILITY AND PROJECT DESCRIPTION

Existing Facility

The USDA APHIS – Miami Import Center facility consists of two incinerators used in the incineration of biological waste and animal cremations. The existing facility consists of the following emissions units.

Facility ID No. 0250390

ID No.	Emission Unit Description
002	One (1) Advanced Combustion Systems Biological Waste Incinerator (PPQ Facility) Model# CA 500P Maximum Charge Rate: 500 lb/hr Fuel: Natural Gas SN: 6753-1
003	One (1) Advanced Combustion Systems Biological Waste Incinerator (VS Facility) Model# CA 500P Maximum Charge Rate: 500 lb/hr Fuel: Natural Gas SN: 6753-2

Proposed Project

This project is for the installation of two (2) incinerators to replace the existing incinerators. This project will add the following emissions units.

Facility ID No. 0250390

ID No.	Emission Unit Description
004	One (1) EPA Technologies Biological Waste Incinerator Model# EPAT-3.0 Maximum Charge Rate: 500 lb/hr Fuel: Natural Gas
005	One (1) EPA Technologies Biological Waste Incinerator Model# EPAT-3.0 Maximum Charge Rate: 500 lb/hr Fuel: Natural Gas

FACILITY REGULATORY CLASSIFICATION

- The facility is not a major source of hazardous air pollutants (HAP).
- 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 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 Natural Non-Title V minor source.

SECTION 2. ADMINISTRATIVE REQUIREMENTS

1. Permitting Authority: The permitting authority for this project is the Miami-Dade County Department of Environmental Resources Management (DERM), Air Quality Management Division. The DERM's mailing address is: 701 NW 1st Court, Suite 400, Miami, Florida 33136. The DERM's telephone number is 305/372-6925. All documents related to applications for permits to operate an emissions unit shall be submitted to the DERM Air Quality Management Division.

2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the DERM Air Quality Management Division. The mailing address and phone number of the DERM Air Quality Management Division is: 701 NW 1st Court, Suite 400, Miami, Florida 33136. The DERM's telephone number is 305/372-6925.

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.

   d. Appendix D. Common testing requirements. (If applicable)

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, and Chapter 24, Code of Miami-Dade County. 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 DERM or the Florida Department of Environmental Protection (FDEP) may require the permittee to conform to new or additional conditions. The DERM or FDEP shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the DERM or FDEP may grant additional time.
   [Rule 62-4.080, F.A.C.]

6. Modifications: The permittee shall notify the DERM upon commencement of construction. No new emissions unit shall be constructed and no existing emissions unit shall be modified without obtaining an air construction permit from the DERM. Such permit shall be obtained prior to beginning construction or modification.
   [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]

7. Source Obligation:

   (a) At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by virtue of a relaxation in any enforceable limitation which was established after August 7, 1980, on the capacity of the source or modification otherwise to emit a pollutant, such as a restriction on hours of operation, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.

(b) At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by exceeding its projected actual emissions, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.

[Rule 62-212.400(12), F.A.C.]

8. Application for Air Operation Permit: This permit authorizes construction and/or installation of the permitted emission unit(s) and initial operation to determine compliance with the FDEP and the DERM rules. **An operation permit is required for regular operation of the permitted emission units.** The owner or operator shall apply for and receive an operation permit prior to expiration of this permit. An application for an operation permit shall be submitted to the Miami-Dade County Department of Environmental Resources Management, Air Quality Management Division. To apply for an operation permit, the applicant shall submit the appropriate application fee and, in triplicate, the appropriate application form, a certification that construction was completed with a notation of any deviations from the conditions on the construction permit, compliance test results, and such additional information as the DERM may by law require.
   [Rule 62-4.030, 62-4.050, 62-4.220, and 62-210.300 F.A.C.]

9. Extension of This Permit: The expiration date of this construction permit may be extended upon request of the owner or operator and submission of the appropriate fee to the Miami-Dade County, Department of Environmental Resources Management, Air Quality Management Division **at least 60 days prior** to the expiration date of this permit.
   [Rule 62-4.030, 62-4.050, 62-4.070(3) and 62-4.220 F.A.C.]

10. Annual Report Required: The Annual Operating Report (DEP Form No. 62-210.900(5)) shall be completed each year and submitted to the Miami-Dade County, DERM, Air Quality Management Division office or submitted electronically to the Florida Department of Environmental Protection by April 1 of the following year.
    [Rule 62-210.370(3) F.A.C.]

11. Waste Disposal: The owner or operator shall treat, store, and dispose of all liquid, solid and hazardous wastes in accordance with all applicable Federal, State and Local regulations.

This section of the permit addresses the following emissions units.

ID No.	Emission Unit Description
004	One (1) EPA Technologies Biological Waste Incinerator Model# EPAT-3.0 Maximum Charge Rate: 500 lb/hr Fuel: Natural Gas
005	One (1) EPA Technologies Biological Waste Incinerator Model# EPAT-3.0 Maximum Charge Rate: 500 lb/hr Fuel: Natural Gas

EQUIPMENT

1. Equipment Name: The permittee is authorized to install two (2) incinerators.
   [Application No. 0250390-007-AC received December 17, 2010]

PERFORMANCE RESTRICTIONS AND EMISSIONS STANDARDS

2. Visible Emissions: Visible emissions shall not exceed five percent (5%) opacity except that visible emissions not exceeding fifteen (15%) percent opacity are allowed for up to six (6) minutes in any one (1) hour period.
   [Rule 62-296.401(1)(a) F.A.C.]

3. Operating Rate Restriction: The incinerator operating rate shall not exceed 500 pounds per batch incineration cycle of one (1) hour.
   [Rule 62-4.070(3) F.A.C.; Requested by permittee in application received on December 17, 2010 for Permit No. 0250390-007-AC]

4. Hydrochloric Acid Emissions: Hydrochloric Acid (HCl) emissions shall not exceed 4.0 pounds per hour.
   [Rule 62-296.401(4)(b)2b F.A.C.]

5. Carbon Monoxide Emissions: Carbon Monoxide (CO) emissions shall not exceed 100 parts per million by volume, dry basis, corrected to 7% O_2 on an hourly average basis.
   [Rule 62-296.401(6)(b)3 F.A.C.]

6. Particulate Matter Emissions: Particulate matter emissions shall not exceed 0.080 grains per dry standard cubic foot of flue gas, corrected to 7% O_2.
   [Rule 62-296.401(6)(b)2 F.A.C.]

7. Hours of Operation: The referenced emission unit(s) may not operate in excess of 8 hours/day, 7 days/week, 52 weeks/year, 2,800 hrs/year.
   [Rule 62-4.070(3) F.A.C.; Requested by permittee in application received on December 17, 2010 for Permit No. 0250390-007-AC]

8. Incinerator Design/Temperature Requirements: Incinerator units for which a complete application for a permit to construct a new unit was received by the FDEP on or after August 30, 1989, shall provide design calculations to confirm a sufficient volume in the secondary chamber combustion zone to provide for at least a 1.0 second gas residence time at 1800 °F. The actual operating temperature of the secondary

chamber combustion zone shall be no less than 1600 °F throughout the combustion process in the primary chamber. Primary chamber and stack shall not be used in calculating this residence time. Incineration in the primary chamber shall not begin unless the secondary chamber combustion zone temperature is equal to or greater than 1600 °F.
[Rule 62-296.401(6)(c)1 F.A.C.]

9. Mechanically Fed Incinerator Requirements: Mechanically fed facilities shall incorporate an air lock system to prevent opening the incinerator to the room environment. The volume of the loading system shall be designed to prevent overcharging, thereby assuring complete combustion of the waste.
[Rule 62-296.401(4)(c)2 F.A.C.]

10. Incinerator Ignition Requirements: Incineration or ignition of waste shall not begin until the secondary (or last) combustion chamber temperature requirement (1600°F) is attained. All air pollution control and continuous emission monitoring equipment shall be operational and functioning properly prior to the incineration or ignition of waste and until all the wastes are incinerated. The secondary (or last) combustion chamber temperature requirement (1600°F) shall be maintained until the wastes are completely combusted.
[Rule 62-296.401(4)(c)3 F.A.C.]

11. Operation During Emissions Test: Testing of emissions shall be conducted with the unit operating at a capacity that is representative of normal operations and is not greater than the manufacturer's recommended capacity. The operating capacity shall be a batch load, in pounds, for a batch animal crematory unit and a charging rate, in pounds per hour, for a ram-charged animal crematory unit.
[Rule 62-296.401(6)(g)]

12. Continuous Emissions Monitoring Requirements: Each owner or operator of a biological waste incineration facility shall install, operate, and maintain continuous emission monitors to record temperature at the point or beyond where 1.0 second gas residence time is obtained in the secondary chamber combustion zone in accordance with the manufacturer's instructions. In addition, each crematory unit installed after February 1, 2007, shall be equipped and operated with a pollutant monitoring system to automatically control combustion based on continuous in-stack opacity measurement. Such system shall be calibrated to restrict combustion in the primary chamber whenever any opacity exceeding fifteen percent (15%) opacity is occurring. A complete file of all temperature measurements; all continuous monitoring system, monitoring device, and performance testing measurements; all continuous monitoring system performance evaluations; all continuous monitoring system or monitoring device calibration checks; and all adjustments, preventive maintenance, and corrective maintenance performed on these systems or devices, shall be recorded in a permanent legible form available for inspection. Continuous temperature monitoring documentation shall include operator name, operator indication of when cremation in the primary chamber was begun, date, time, and temperature markings. Pollutant monitoring system documentation shall include indication of when the opacity measurement system was cleaned and checked for proper operation in accordance with the manufacturer's recommended maintenance schedule. The file shall be retained for at least two (2) years following the recording of such measurements, maintenance, reports, and records.
[Rule 62-296.401(6)(i) F.A.C.]

13. Radioactive Waste Restrictions: The owner or operator is advised to contact the Department of Health regarding requirements that may apply to any proposed burning of radioactive waste.
[Rule 62-296.401(4)(c)4 F.A.C.]

14. Animal Incineration Container Restrictions: Containers for the incineration of dead animals may contain no more than 0.5 percent by weight chlorinated plastics as demonstrated by the manufacturer's data sheet. Animal crematory units shall not cremate dead animals which were used for medical or commercial experimentation. No other material, including biomedical waste as defined in Rule 62-210.200, F.A.C., shall be incinerated.
[Rule 62-296.401(6)(d) F.A.C.]

15. Equipment Maintenance: All animal crematory units shall be maintained in proper working order in accordance with the manufacturer's specifications to ensure the integrity and efficiency of the equipment. If a crematory unit contains a defect that affects the integrity of the unit, the unit shall be taken out of service. No person shall use or permit the use of that unit until it has been repaired or adjusted. Repair records on all crematory units shall be maintained onsite for at least two (2) years. A written plan with operating procedures for startup, shutdown and malfunction of each crematory unit shall be maintained and followed during those events. Each unit's burners shall be operated with a proper air-to-fuel ratio. If the unit so allows, the burners' flame characteristics shall be visually checked at least once during each operating shift and adjusted when warranted by the visual checks.
[Rule 62-296.401(6)(e) F.A.C.]

16. Hazardous Waste Restrictions: The owner or operator is advised to contact the Department's Division of Waste Management regarding requirements that may apply to any proposed burning of hazardous waste.
[Rule 62-296.401(4)(c)5 F.A.C.]

17. Fuel Restrictions: Fuel used shall be limited to natural gas.
[Rule 62-4.070(3) F.A.C.; Requested by permittee in application received on December 17, 2010 for Permit No. 0250390-007-AC]

MONITORING REQUIREMENTS, RECORDS AND REPORTS

18. Testing Procedures: Test procedures shall conform to the procedures specified in Rule 62-297.310, F.A.C. All test results shall be reported to the DERM in accordance with the provisions of Rule 62-297.310, F.A.C. Testing of emissions shall be conducted with the unit operating at a capacity that is representative of normal operations and is not greater than the manufacturer's recommended capacity. The operating capacity shall be a batch load, in pounds, for a batch animal crematory unit and a charging rate, in pounds per hour, for a ram-charged animal crematory unit.
[Rules 62-296.401(6)(f)5; 62-296.401(6)(g); 62-296.401(4)(d)6 & 62-4.070(3) F.A.C.]

19. Visible Emissions Testing: New and existing facilities shall demonstrate individual emissions unit compliance with the visible emissions standard prior to submitting the application for initial air operation permit and annually thereafter. The test method for visible emissions shall be DEP Method 9, incorporated in Chapter 62-297, F.A.C.
[Rules 62-296.401(4)(e)1a; 62-296.401(4)(d)1; 62-296.401(6)(f)1 & 62-296.401(6)(h)4 F.A.C.]

20. Particulate Matter Emissions Testing: New and existing facilities shall have performance tests conducted for particulate matter prior to submitting the application for an initial air operation permit, and annually thereafter. The reference test method for particulate matter emissions shall be EPA Method 5 or 26A. The minimum sample volume shall be thirty (30) dry standard cubic feet.
[Rules 62-296.401(6)(f)4 & 62-296.401(6)(h)4 F.A.C.]

21. Hydrochloric Acid Emissions Testing: New and existing facilities shall demonstrate individual emissions unit compliance with the hydrochloric acid emissions standard upon initial compliance and prior to submitting the application for a renewal air operation permit. The test method for hydrochloric acid emissions shall be EPA Method 26 or 26A, incorporated and adopted by reference in Chapter 62-297, F.A.C.
    [Rules 62-296.401(4)(e)1b & 62-296.401(4)(d)5 F.A.C.]

22. Carbon Monoxide Emissions Testing: New and existing facilities shall have performance tests conducted for carbon monoxide prior to submitting the application for an initial air operation permit, and annually thereafter. The test method for carbon monoxide emissions shall be EPA Method 10.
    [Rules 62-296.401(6)(f)2 & 62-296.401(6)(h)4 F.A.C.]

23. Equipment Accuracy: Equipment or instruments used to directly or indirectly determine process variables, including devices such as scales and temperature recorders, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.
    [Rule 62-297.310(5)(b) F.A.C.]

24. Operator Certification: Each operator of the unit shall successfully complete a training program meeting the requirements of 40 CFR 60.53c(c) and the annual refresher training course requirements of 40 CFR 60.53c(f), adopted and incorporated by reference at Rule 62-204.800, F.A.C.
    a. If the incinerator is modified to the extent that a Department construction permit is required, the operators shall be retrained to operate the modified incinerator.
    b. An operator's training certificate must be kept on file at the facility for the duration of the operator's employment and for an additional two (2) years after termination of employment. The owner shall not allow the incinerator to be operated unless it is operated by an operator who has satisfactorily completed the required training program.

    [Rule 62-296.401(4)(c)6 F.A.C.]

25. Continuous Emissions Monitoring Records: A complete file of all measurements, including continuous emissions monitoring system, monitoring device, and performance testing measurements; all continuous emissions monitoring system performance evaluations; all continuous emissions monitoring system or monitoring device calibration checks; adjustments and maintenance performed on these systems or devices; and all other information required, shall be recorded in a permanent legible form available for inspection. The file shall be retained for at least two (2) years following the date of such measurements, maintenance, reports, and records.
    [Rules 62-296.401(4)(f)2; 62-296.401(6)(i) F.A.C.]

26. Continuous Temperature Chart Records: The continuous temperature chart documentation shall include at a minimum the following:
    - Date markings
    - Time markings
    - Temperature scale markings
    - Operator name
    - Operator indication of when combustion of waste in the primary chamber began and when combustion ceased

    [Rule 62-296.401(6)(i) F.A.C.]

27. Operations and Maintenance Log: A daily operations and maintenance log shall be kept by the operators showing the following information. This log shall be retained for at least two years and made available upon request.
    - Date
    - Name of the operator
    - Type of material incinerated
    - Time the combustion of waste in the primary chamber began, and number of hours taken for incineration
    - Minimum temperature of the secondary chamber when incinerator is in operation
    - Any maintenance performed; indicate when, what, why, and by whom it was performed
    - Weight (as weighed on scale) of materials placed in the primary chamber

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

28. Incinerated Container Records: If containers are incinerated, documentation from the manufacturers certifying that they are composed of 0.5 percent or less by weight chlorinated plastics shall be kept on-file at the site for the duration of their use and for at least two (2) years after their use. This documentation must also be submitted with any application for an initial or renewal air operation permit.
    [Rules 62-4.070(3) & 62-296.401(6)(d) F.A.C.]

29. Timekeeping: A log shall be kept with the number of hours worked daily, and monthly. This log shall be retained for at least three years and made available upon request.
    [Rule 62-4.070(3) F.A.C.]