Technical Evaluation and Preliminary Determination

APPLICANT
Dupuy Silo Facility, LLC
1520 Edgewood Avenue North
Jacksonville, FL 32254-1748

FACILITY
Dupuy Silo Facility at Jacksonville, FL
Coffee Bean Receiving, Storage, Mixing and Shipping Facility
ID No. 0310509
1520 Edgewood Avenue North
Jacksonville, FL 32254-1748

COUNTY
Duval

PERMITTING AUTHORITY
Neighborhoods Department
Environmental Quality Division
214 North Hogan Street, Suite 500
Jacksonville, FL 32202
Telephone: (904) 255-7100
Fax: (904) 588-0518

1. GENERAL PROJECT INFORMATION

Air Pollution Regulations

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

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

In accordance with the terms of its Specific Operating Agreement, the City of Jacksonville, Neighborhoods Department, Environmental Quality Division has been delegated the Permitting Authority to process this determination.

Glossary of Common Terms

Because of the technical nature of the project, the permit determination contains numerous acronyms and abbreviations, which will be defined in the permit determination.

Facility Description and Location

Dupuy Silo Facility at Jacksonville, FL is a coffee bean receiving, storage, mixing and shipping facility, which is categorized under Standard Industrial Classification Code No. 5149. This facility is located in Duval County at 1520 Edgewood Avenue North, Jacksonville, FL 32254-1748. The Universal Transverse Mercator coordinates are Zone 17, 429.72 km East and 3357.23 km North. The latitude and longitude coordinates are 30° 20' 40" North and 81° 43' 54" West.

This facility is located in an area designated as; unclassifiable for the air pollutants particulate matter less than or equal to ten (10) micrometers (PM_{10}), sulfur dioxide (SO_2), and lead (Pb); an air quality maintenance area for ozone (O_3); and in the area of influence of an air quality maintenance area for particulate matter (PM); pursuant to state and federal Ambient Air Quality Standards (AAQS), Chapter 62-204, F.A.C., and Rule 2.201, Jacksonville Environmental Protection Board (JEPB).

Facility Regulatory Categories

- 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.
- 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, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.
- The facility is a natural non-Title V source of air pollution.

Project Description
Dupuy Silo Facility at Jacksonville, FL receives, stores, mixes, and ships green coffee beans. The facility plans to install one (1) new process line with two (2) emission points.

The new process line will unload, clean, sort, and package green coffee beans. The green coffee beans are then shipped to a coffee plant for roasting, grinding, and packaging. The new process line is rated at 10,000 pounds [five (5) tons] per hour and 43,800 tons per year.

The first emission point for the new process line [to be designated Emission Unit (EU) 006] will be a 24,500 cubic feet per minute, fabric filter baghouse (AIRLANCO Model 192ATD10).

The second emission point for the new process line (to be designated EU 007) will be a 20,000 cubic feet per minute, cyclone separator (CIMBRIA Model CF930).

The other process lines will not be changed by this construction project.

Processing Schedule
- 08/28/2012 – Received the construction permit application

2. PSD APPLICABILITY

PSD and Title V Applicability for Project
The existing facility is not a major stationary source of air pollution for PSD purposes because the potential emissions of PSD air pollutants are less than 250 tons per year pursuant to Rule 62-210.200(189), F.A.C., and Rule 2.301, JEPB.

This project is not subject to PSD preconstruction review requirements since the proposed project itself has potential emissions of PSD air pollutants that are less than 250 tons per year pursuant to Rule 62-210.200(189), F.A.C., and Rule 2.301, JEPB.

The facility is a natural non-Title V source of air pollution in that the potential emissions of regulated air pollutants are less than 100 tons per year and the potential emissions of Hazardous Air Pollutants (HAP) are less than 10 tons per year for a single HAP and less than 25 tons per year for total HAP pursuant to Rule 62-210.200(188), F.A.C., and Rule 2.301, JEPB.

3. APPLICATION REVIEW

Discussion of Emissions
Process line – The new process line will unload, clean, sort, and package green coffee beans. These processes can produce large quantities of particulate matter (PM). Two (2) emission points are associated with the proposed process line; the low temperature fabric filter baghouse (collects emissions from the cleaning and sorting sections of the process line) and the cyclone separator (collects emissions from the packaging section of the process line). The proposed process line has a production capacity of five (5) tons per hour (43,800 tons per year). The following pollutants have the potential to be emitted in the following amounts to the atmosphere:

Fabric Filter Baghouse
- PM – 1.3 tons per year (27.6 tons per year allowable)

Cyclone Separator
- PM – 1.3 tons per year (22.5 tons per year allowable)

The existing process lines will not be modified under this construction permit. The following pollutants have the potential to be emitted in the following amounts to the atmosphere:

Green Bean Receiving (EU 001)
- PM – 2.9 tons per year (9.9 tons per year allowable)

Green Bean Cleaning (EU 002)
- PM – 6.4 tons per year (21.9 tons per year allowable)

Green Bean Storage & Mixing (EU 003)
- PM – 2.9 tons per year (9.9 tons per year allowable)

Green Bean Shipping – Lanes 1, 2, and 3 (EU 004)
- PM – 1.9 tons per year (6.4 tons per year allowable)

Green Bean Shipping - Lane 4 (EU 005)
- PM – 0.3 tons per year (1.2 tons per year allowable)

Local Requirements
This facility is subject to Chapter 360 [Environmental Regulation], Chapter 362 [Air and Water Pollution], Chapter 365 [Hazardous Regulated Substance Program], and Chapter 376 [Odor Control] of the Ordinance Code of the City of Jacksonville, Title X; and Rule 1 [Final Rules with Respect to Organization, Procedure, and Practice] and Rule 2, Part Numbers I through III and Part Numbers X through XIV [Air Pollution Control], JEPB.

State Requirements
This facility is subject to the applicable sections of Chapter 403, F.S. and Rules 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C.

Federal NSPS Provisions
There are no subparts of 40CFR60 that apply to this facility.

Federal NESHAP Provisions
This facility is not a major source of Hazardous Air Pollutants (HAP). There are no area source subparts of 40CFR63 that apply to this facility.

Other Permit Determination Conditions
There are no other conditions associated with this permit determination.

4. PERMIT DETERMINATION
The Permitting Authority makes the determination that this project does require an Air Construction Permit and that the proposed project will comply with all applicable local, state, and federal air pollution regulations. This determination is based on a technical review of the complete application, reasonable assurances provided by the applicant, and the conditions specified in the permit determination. C. Blane Johnson is the project engineer responsible for reviewing the application and performing the permit determination. He may be reached by telephone at (904) 255-7199 and by e-mail at chrisb@coj.net.

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