

## MEMORANDUM

**DATE:** November 16, 2012

**TO:** Richard D. Garrity, Ph.D.

**FROM:** Stephen Hathaway, P.E.                      **THRU:** Diana M. Lee, P.E.

**SUBJECT:**    **Air Construction Permit – Griffin Industries, LLC**  
                  **DRAFT Permit No. 0570163-004-AC**

Attached is DRAFT Permit No. 0570163-004-AC which authorizes Griffin Industries, LLC to replace Cooker #1 in the existing rendering process with a larger cooker. The new cooker will be a Dupps Company Supercookor rated at a maximum of 43,440 pounds per hour of raw material input, based on a raw material moisture content of 34%. Additionally, the water-cooled shell and tube condenser for Cooker #1 will be replaced with a larger condenser rated at 16.1 MMBtu/hr to handle the increased steam and condensable malodorous compound loading, and will be tied into the existing three-stage scrubbing system. Griffin Industries operates a continuous rendering facility located at 1001 Orient Road in Tampa.

Griffin Industries currently processes animal remains, scrap meat, and the interface from used restaurant grease using two (2) high pressure steam heated cookers that are used to separate fat from meat or animal remains by slow heating and processing of meat, fat, bone, and offal. Currently, each cooker has a maximum input rate of 34,000 pounds per hour to produce tallow, yellow grease, and bone meal, based on a raw material moisture content of 34%. The Dupps Company 1500 Equacooker (Cooker #1) will be replaced with a Dupps Company Supercookor, increasing the capacity of Cooker #1 from 34,000 pounds per hour to 43,440 pounds per hour of raw material input. Correspondingly, the existing shell and tube condenser for Cooker #1 will be replaced with a larger condenser which is designed to handle a higher condensable compound loading rate. The new cooker will be of similar design as the existing cooker.

Each cooker has a water-cooled shell and tube condenser to collapse the steam and control condensable odor emissions generated from the cooking operation. The two water-cooled shell and tube condensers operating in parallel are followed by three scrubbers in series; a 10,000 acfm Venturi Scrubber and High Intensity Packed Bed Scrubber to control non-condensable odor emissions from the cookers, and a 50,000 acfm Room Air Scrubber to control the pre-treated process vapors and fugitive vapors from the processing building. The Room Air Scrubber treats approximately 40,000 acfm of in-plant air and 10,000 acfm of pretreated process vapors from the Venturi and High Intensity Packed Bed scrubbers. The in-plant air emissions consist of emissions from the feed screws, grinders, control wheels, drainers, centrifuges, screw presses, and other miscellaneous process equipment. Sodium hypochlorite is injected as a scrubbing agent in the scrubbers for odor control. In addition, sodium hydroxide and muriatic acid are used for pH control in the scrubbers.

In addition, there is a tertiary odor control system, which uses three atomizing spray nozzles that distribute a mist of odor masking compound around the opening gate at the truck unloading/receiving pit area for the purpose of masking odors in the immediate raw material unloading area. In order to mitigate potential odors, all raw materials are processed within 24 hours of receipt.

Two steam boilers, one rated at 62.76 MMBtu/hr and another rated at 31.38 MMBtu/hr, supply high pressure process steam for use in the two cookers. Both boilers are fired primarily on natural gas with backup of virgin No. 2 fuel oil with less than 0.05% sulfur content by weight. The facility also maintains the ability to combust yellow grease due to its similar heat content to fuel oil. Both of the boilers are exempt from permitting pursuant to Rule 62-210.300(3)(a), F.A.C.

Additionally, there is a Restaurant Food Grease (RFG) processing operation that involves using steam to heat and concentrate the grease by removing water in an evaporator. According to Griffin Industries, this evaporator will be replaced with a similar unit. The RFG operation generates approximately 800 acfm and is tied into the existing scrubber system. This activity is considered to be an insignificant emissions source with respect to the overall rendering process.

The final products from this facility consist of bone meal (crax), tallow, and yellow grease. These products are sold for use in animal feed applications, chemical manufacturing, and combustion applications. Below is a list of the process and pollution control equipment that will be in place upon completion of this air construction permit:

<u>Equipment</u>	<u>Manufacturer</u>	<u>Model No.</u>
Cooker #1	The Dupps Company	Supercookor
Cooker #2	The Dupps Company	1500 Equacooker
Shell and tube condenser #1	Texas Metal Fabrication Company	T-42
Shell and tube condenser #2	The Dupps Company	12 SS
Venturi Scrubber	10,000 ACFM SCP Control, Inc.	8" x 20"
Packed Bed Scrubber	10,000 ACFM GPI Corporation	#4468 60" x 258"
Room Air Scrubber	50,000 ACFM American Fan Co.	BI-490

This project is subject to Rule 62-296.320, General Pollutant Emission Limiting Standards, since it is a source of PM, VOC, visible emissions, and a potential source of odors.

Based on our review, we recommend the issuance of the DRAFT AC permit.

TECHNICAL EVALUATION  
AND  
PRELIMINARY DETERMINATION

FOR

Griffin Industries, LLC

Hillsborough County

Air Construction Permit

Application Number

0570163-004-AC

Environmental Protection Commission of

Hillsborough County

Tampa, FL

November 16, 2012

## I. Project Description

A. Applicant: Tim Garris  
District Manager  
Griffin Industries, LLC  
1001 Orient Road  
Tampa, FL 33619

B. Engineer: John Crowley, P.E.  
Griffin Industries, LLC  
4221 Alexandria Pike  
Cold Spring, KY 41076

P.E. No.: 49879

### C. Project and Location:

The applicant proposes to replace Cooker #1 in the existing rendering process with a larger cooker. The new cooker will be a Dupps Company Supercookor rated at a maximum of 43,440 pounds per hour of raw material input, based on a raw material moisture content of 34%. Additionally, the water-cooled shell and tube condenser for Cooker #1 will be replaced with a larger condenser rated at 16.1 MMBtu/hr to handle the increased steam and condensable malodorous compound loading, and will be tied into the existing three-stage scrubbing system. Griffin Industries operates a continuous rendering facility located at 1001 Orient Road in Tampa.

The project has been assigned the NEDS Source Classification Code Nos. 3-02-038-01 and 3-02-038-03 for Industrial Processes, Food and Agriculture, Animal/Poultry Rendering. The Standard Industrial Classification (SIC) Code for the project is No. 2077 - Rendering Plants. The project is located at 1001 Orient Road, Tampa, FL 33619. UTM Coordinates of the facility are Zone 17, 364.1 E and 3096.4 N.

### D. Process and Controls:

Griffin Industries currently processes animal remains, scrap meat, and the interface from used restaurant grease using two (2) high pressure steam heated cookers that are used to separate fat from meat or animal remains by slow heating and processing of meat, fat, bone, and offal. Currently, each cooker has a maximum input rate of 34,000 pounds per hour to produce tallow, yellow grease, and bone meal, based on a raw material moisture content of 34%. The Dupps Company 1500 Equacooker (Cooker #1) will be replaced with a Dupps Company Supercookor, increasing the capacity of Cooker #1 from 34,000 pounds per hour to 43,440 pounds per hour of raw material input. Correspondingly, the existing shell and tube condenser for Cooker #1 will be replaced with a larger condenser rated at 16.1 MMBtu/hr which is designed to handle a higher condensable compound loading rate. The new cooker will be of similar design as the existing cooker.

Each cooker has a water-cooled shell and tube condenser to collapse the steam and control condensable odor emissions generated from the cooking operation. The two water-cooled

shell and tube condensers operating in parallel are followed by three scrubbers in series; a 10,000 acfm Venturi Scrubber and High Intensity Packed Bed Scrubber to control non-condensable odor emissions from the cookers, and a 50,000 acfm Room Air Scrubber to control the pre-treated process vapors and fugitive vapors from the processing building. The Room Air Scrubber treats approximately 40,000 acfm of in-plant air and 10,000 acfm of pretreated process vapors from the Venturi and High Intensity Packed Bed scrubbers. The in-plant air emissions consist of emissions from the feed screws, grinders, control wheels, drainers, centrifuges, screw presses, and other miscellaneous process equipment. Sodium hypochlorite is injected as a scrubbing agent in the scrubbers for odor control. In addition, sodium hydroxide and muriatic acid are used for pH control in the scrubbers.

Based on stack testing conducted in March 1986, the dual Venturi and High Intensity Packed Bed scrubber system was found to be 97% efficient in removing odorous compounds, using ASTM D1391-57. In the mid to late 1990's, the Room Air Scrubber was installed to provide additional odor controls for the process vapors and the fugitive process emissions for an overall odor control efficiency of 99+%.

In addition, there is a tertiary odor control system, which uses three atomizing spray nozzles that distribute a mist of odor masking compound around the opening gate at the truck unloading/receiving pit area for the purpose of masking odors in the immediate raw material unloading area. In order to mitigate potential odors, all raw materials are processed within 24 hours of receipt.

Two steam boilers, one rated at 62.76 MMBtu/hr and another rated at 31.38 MMBtu/hr, supply high pressure process steam for use in the two cookers. Both boilers are fired primarily on natural gas with backup or virgin No. 2 fuel oil with less than 0.05% sulfur content by weight. The facility also maintains the ability to combust yellow grease due to its similar heat content to fuel oil. Both the boilers are exempt from permitting based on Rule 62-210.300(3)(a), F.A.C. and the EPC permit determination letter dated March 6, 2000.

Additionally, there is a Restaurant Food Grease (RFG) processing operation that involves using steam to heat and concentrate the grease by removing water in an evaporator. According to Griffin Industries, this evaporator will be replaced with a similar unit. The RFG operation generates approximately 800 acfm and is tied into the existing scrubber system. This activity is considered to be an insignificant emissions source with respect to the overall rendering process.

The final products from this facility consist of bone meal (crax), tallow, and yellow grease. These products are sold for use in animal feed applications, chemical manufacturing, and combustion applications. Below is a list of the process and pollution control equipment that will be in place upon completion of this air construction permit:

<u>Equipment</u>	<u>Manufacturer</u>	<u>Model No.</u>
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Room Air Scrubber	50,000 ACFM American Fan Co.	BI-490

This project is subject to Rule 62-296.320, General Pollutant Emission Limiting Standards, since it is a source of PM, VOC, visible emissions, and a potential source of odors.

E. Application Information:

Received on: October 22, 2012

Information Requested: November 9, 2012

Application Complete: October 22, 2012

## II. Rule Applicability

This project is subject to the pre-construction review requirements of Chapter 403, Florida Statutes, Chapters, 62-204, 62-210, 62-212, 62-296, and 62-297, Florida Administrative Code (F.A.C.) and Chapter 1-3 of the Rules of the Environmental Protection Commission of Hillsborough County.

This project is not subject to the requirements of Rule 62-212.400, Prevention of Significant Deterioration, F.A.C. or Rule 62-212.500, New Source Review for Non-attainment Areas, F.A.C., since the facility is minor by state definition.

This project is subject to the requirements of Rule 62-212.300, Sources Not Subject to Prevention of Significant Deterioration or Non-attainment Requirements, F.A.C., since a permit is required for this project.

This project is subject to the requirements of Rule 62-296.320, General Pollutant Emission Limiting Standards, F.A.C., since the facility is a source of particulate matter, VOC's, visible emissions, and a potential source of odor.

This project is not subject to the requirements of Rule 62-296.401 through 62-296.417, Specific Emission Limiting and Performance Standards, F.A.C., since there is not an applicable source category.

This project is not subject to the requirements of Rule 62-296.500, Reasonably Available Control Technology for VOC's, F.A.C., since there is not an applicable category for this source.

This project is not subject to the requirements of Rule 62-296.600, F.A.C., Reasonably Available Control Technology for Lead, since there is not an applicable category for this source.

This project is not subject to the requirements of Rule 62-296.700, Reasonably Available Control Technology for Particulate Matter, F.A.C., since the PM PTE is less than 5 lbs/hr and 15 tons per year.

This project is not subject to the requirements of Rule 62-204.800, Federal Regulations Adopted by Reference, F.A.C., since there is not an applicable category for this source.

This project is subject to the requirements of Chapter 84-446, Laws of Florida and Chapter 1-3, Rules of the Environmental Protection Commission of Hillsborough County.

### III. Summary of Emissions

<b>Emission Unit(s)</b>	<b>Pollutant</b>	<b>Potential Emissions (TPY)*</b>	<b>Allowable Emissions**</b>	<b>Applicable Regulation</b>
EU 003 – Rendering Operation	PM	3.1	N/A	N/A
	VOC	8.0	N/A	N/A
	H <sub>2</sub> S	1.7	N/A	N/A
	Opacity	N/A	20%	62-296.320, F.A.C.
	Odor	N/A	N/A	62-296.320, F.A.C.

\*Based on a maximum of 21.7 tons per hour of raw material input and 34% moisture content. Emission Factors are based on AP-42 Section 9.5.3 for PM and H<sub>2</sub>S, and similar source testing for VOC. According to AP-42, raw material moisture content can vary between 37-75% based on the type of raw material, with an average of about 56% moisture. The raw material throughput rate was found to be at its maximum based on 34% moisture and the maximum evaporation rate of the new cooker, which is 14,770 lbs/hr.

\*\* Emission limiting standards are for odor and opacity only.

H<sub>2</sub>S emissions were also calculated, and it was determined that the concentration would be less than the odor threshold with the new cooker in operation with the existing scrubber system. Using a conservative odor control efficiency of 97%<sup>1</sup> for the scrubber system, the estimated stack concentration from the new cooker was estimated to be 0.002 ppmw. The odor threshold for H<sub>2</sub>S is 0.005 ppmw.

Inventory of Title III pollutants is estimated to be less than 10 TPY individually and less than 25 TPY collectively for this emission unit.

<sup>1</sup> On-site stack testing dated March 1986.

### IV. Conclusions:

The emission limits proposed by the applicant will meet all of the requirements of Chapters 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C., and Chapter 1-3, Rules of the Commission.

The General and Specific Conditions listed in the proposed permit (attached) will assure compliance with all the applicable requirements of Chapters 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C.

### V. Proposed Agency Action:

Pursuant to Section 403.087, Florida Statutes and Rule 62-4.070, Florida Administrative Code the Environmental Protection Commission of Hillsborough County hereby gives notice of its intent to issue a permit to construct the aforementioned air pollution source in accordance with the draft permit and its conditions as stipulated (see attached).

CERTIFIED MAIL

In the Matter of an  
Application for Permit by:

File No.: 0570163-004-AC  
County: Hillsborough

Tim Garris  
District Manager  
Griffin Industries, LLC  
1001 Orient Road  
Tampa, FL 33619 /

INTENT TO ISSUE

The Environmental Protection Commission of Hillsborough County (EPC), as delegated by the Florida Department of Environmental Protection (DEP) gives notice of its intent to issue a permit (copy attached) for the proposed project as detailed in the application specified above, for the reasons stated below.

The applicant, Griffin Industries, LLC applied on October 22, 2012 to the EPC for an air construction permit to replace one of the existing cookers with a new cooker at the rendering facility located at 1001 Orient Road, Tampa, FL 33619. The maximum process rate of the cooker will increase from 34,000 to 43,440 lbs/hr of raw material input. In addition, a new shell and tube condenser rated at 16.1 MMBtu/hr will be installed to accommodate the increased cooker capacity. Emissions will be controlled by the existing 3-stage scrubber system.

The EPC has permitting jurisdiction under Chapter 403 Florida Statutes (F.S.) and Florida Administrative Code (F.A.C.) Chapters 62-4 and 62-210. The project is not exempt from permitting procedures. The EPC has determined that an air pollution construction permit is required to commence or continue operations at the described facility.

The EPC intends to issue this permit based on the belief that reasonable assurances have been provided to indicate that operation of the source will comply with the appropriate provisions of Florida Administrative Code (F.A.C.) Chapters 62-204 through 62-297 and 62-4.

Pursuant to Section 403.815 and 403.0872, F.S. and Rules 62-103.150 and 62-210.350(3), F.A.C., you (the applicant) are required to publish at your own expense the enclosed Notice of Intent to Issue Permit. The notice shall be published one time as soon as possible, in the legal advertisement section of a newspaper of general circulation in the area affected. For the purpose of this rule, "publication in a

newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. Where there is more than one newspaper of general circulation in the county, the newspaper used must be one with significant circulation in the area that may be affected by the permit. If you are uncertain that a newspaper meets these requirements, please contact the EPC at the address or telephone number listed below. **The applicant shall provide proof of publication to the EPC, Air Permitting Section, at 3629 Queen Palm Dr., Tampa, Florida 33619 (Phone 813-627-2600 - FAX 813-627-2660) within 7 (seven) days of publication.** Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit pursuant to Rule 62-103.150(6), F.A.C.

The EPC will issue the final permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to Section 120.569 and 120.57 F.S. before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below.

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, F.S. The petition must contain the information set forth below and must be filed (received) in the Legal Department of the EPC at 3629 Queen Palm Dr., Tampa, Florida 33619, Phone 813-627-2600, Fax 813-627-2602. Petitions filed by the permit applicant or any of the parties listed below must be filed within 14 (fourteen) days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S. must be filed within 14 (fourteen) days of publication of the public notice or within 14 (fourteen) days of receipt of this notice of intent, whichever occurs first. Under Section 120.60(3), however, any person who asked the EPC for notice of agency action may file a petition within 14 (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, F.A.C.

A petition that disputes the material facts on which the EPC's action is based must contain the following information:

- (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 and the name, address, and telephone number of each petitioner's representative, if any, which shall be the address for service purposes during the course of the proceedings; and an explanation of how the petitioner's substantial interests will be affected by the EPC's determination;
- (c) A statement of how and when the petitioner received notice of the EPC action;
- (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 EPC's proposed action;
- (f) A statement of specific rules or statutes that the petitioner contends requires reversal or modification of the EPC'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

EPC to take with respect to the EPC's proposed action.

A petition that does not dispute the material facts upon which the EPC'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, F.A.C.

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

Mediation under section 120.573, F.S. is not available in this proceeding.

This action is final and effective on the date filed with the Clerk of the EPC unless a petition is filed in accordance with above. Upon the timely filing of a petition, this order will not be effective until further order of the EPC.

In addition to the above, a person subject to regulation has a right to apply to the Department of Environmental Protection for a variance from or waiver of the requirements of particular rules, on certain conditions, under Section 120.542, F.S. The relief provided by this state statute applies only to state rules, not statutes, and not to any federal regulatory requirements. Applying for a variance or waiver does not substitute or extend the time for filing a petition for an administrative hearing or exercising any other right that a person may have in relation to the action proposed in this notice of intent.

The application for a variance or waiver is made by filing a petition with the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, FL 32399-3000. The petition must specify the following information:

- (a) The name, address, and telephone number of the petitioner,
- (b) The name, address, and telephone number of the attorney or qualified representative of the petitioner, if any,
- (c) Each rule or portion of a rule from which a variance or waiver is requested,
- (d) The citation to the statute underlying (implemented by) the rule identified in (c) above,
- (e) The type of action requested,
- (f) The specific facts that would justify a variance or waiver for the petitioner,
- (g) The reason by the variance or waiver would serve the purposes of the underlying statute (implemented by the rule), and
- (h) A statement whether the variance or waiver is permanent or temporary and, if temporary, a statement of the dates showing the duration of the variance or waiver requested.

The Department will grant a variance or waiver when the petition demonstrates both that the application of the rule would create a substantial hardship or violate principles of fairness, as each of the those terms is defined in Section 120.542(2), F.S., and that the purpose of the underlying statute will be or has been achieved by other means by the petitioner.

Persons subject to regulation pursuant to any federally delegated or approved air program should be

aware that Florida is specifically not authorized to issue variances or waivers from any requirements of any such federally delegated or approved program. The requirements of the program remain fully enforceable by the Administrator of United States Environmental Protection Agency and by any person under the Clean Air Act unless and until the Administrator separately approves any variance or waiver in accordance with the procedures of the federal program.

Any person listed below may request to obtain additional information, a copy of the application (except for information entitled to confidential treatment pursuant to Section 403.111, F.S.), all relevant supporting materials, and all other materials available to the EPC that are relevant to the permit decision. Interested persons may contact Diana M. Lee, P.E., at the above address or call (813)627-2600, for additional information.

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 EPC's Legal Office at 3629 Queen Palm Dr., Tampa, Florida 33619 and 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 thirty days after this order is filed with the clerk of the Department.

Executed in Tampa, Florida

ENVIRONMENTAL PROTECTION COMMISSION  
OF HILLSBOROUGH COUNTY

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Richard D. Garrity, Ph.D.  
Executive Director

cc: Florida Department of Environmental Protection, Southwest District (via e-mail)  
John Crowley, P.E. – Griffin Industries, LLC

**CERTIFICATE OF SERVICE**

The undersigned duly designated clerk hereby certifies that this INTENT TO ISSUE and all copies were mailed before the close of business on \_\_\_\_\_ to the listed persons.

**FILING AND ACKNOWLEDGEMENT**

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

\_\_\_\_\_  
Clerk

\_\_\_\_\_  
Date

ENVIRONMENTAL PROTECTION COMMISSION  
OF HILLSBOROUGH COUNTY  
NOTICE OF INTENT TO ISSUE PERMIT

The Environmental Protection Commission of Hillsborough County (EPC), as delegated by the Florida Department of Environmental Protection (DEP) gives notice of its intent to issue air construction Permit No. 0570163-004-AC to Griffin Industries, LLC to replace one of the existing cookers with a new cooker at the rendering facility located at 1001 Orient Road, Tampa, FL 33619. The maximum process rate of the cooker will increase from 34,000 to 43,440 lbs/hr of raw material input. In addition, a new shell and tube condenser rated at 16.1 MMBtu/hr will be installed to accommodate the increased cooker capacity. Emissions will be controlled by the existing 3-stage scrubber system.

A Best Available Control Technology (BACT) determination was not required.

The EPC will issue the Final permit with the conditions of the DRAFT permit unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57, F.S. before the deadline for filing a petition. The procedures for petitioning for hearing are set forth below.

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, F.S. The petition must contain the information set forth below and must be filed (received) in the Legal Department of the EPC at 3629 Queen Palm Dr., Tampa, Florida 33619, Phone 813-627-2600, Fax 813-627-2602. Petitions filed by the permit applicant or any of the parties listed below must be filed within 14 (fourteen) days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S. must be filed within 14 (fourteen) days of publication of the public notice or within 14 (fourteen) days of receipt of this notice of intent, whichever occurs first. Under Section 120.60(3), however, any person who asked the EPC for notice of agency action may file a petition within 14 (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 F.A.C.

A petition that disputes the material facts on which the EPC's action is based must contain the following information:

- (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, and the name, address, and telephone number of each petitioner's representative, if any, which shall be the address for service purposes during the course of the proceedings; and an explanation of how the petitioner's substantial interests will be affected by the agency determination;
- (c) A statement of how and when petitioner received notice of the EPC action;
- (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 EPC proposed action;

- (f) A statement of specific rules or statutes that the petitioner contends requires reversal or modification of the EPC'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 EPC to take with respect to the EPC's proposed action.

A petition that does not dispute the material facts upon which the EPC'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.

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

Mediation under section 120.573, F.S. is not available in this proceeding.

This action is final and effective on the date filed with the Clerk of the EPC unless a petition is filed in accordance with above. Upon the timely filing of a petition this order will not be effective until further order of the EPC.

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 EPC's Legal Office at 3629 Queen Palm Dr., Tampa, Florida 33619 and 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 thirty days after this order is filed with the clerk of the Department.

The complete project file is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at the Environmental Protection Commission of Hillsborough County, 3629 Queen Palm Dr., Tampa, FL 33619. The complete project file includes the proposed Permit, the application, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact Diana M. Lee, P.E., at the above address, or call 813-627-2600, for additional information. Any written comments filed shall be available for public inspection. If written comments received result in a significant change in the proposed agency action, the EPC shall revise the proposed permit and require, if applicable, another Public Notice.

ENVIRONMENTAL PROTECTION COMMISSION OF  
HILLSBOROUGH COUNTY, as Delegated by  
  
STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
  
NOTICE OF PERMIT

Tim Garris  
District Manager  
Griffin Industries, LLC  
1001 Orient Road  
Tampa, FL 33619

Dear Mr. Garris:

Re: Hillsborough County - AP

Enclosed is Permit Number 0570163-004-AC to replace one of the existing cookers with a new cooker at the rendering facility located at 1001 Orient Road, Tampa, FL 33619. The maximum process rate of the cooker will increase from 34,000 to 43,440 lbs/hr of raw material input. In addition, a new shell and tube condenser rated at 16.1 MMBtu/hr will be installed to accommodate the increased cooker capacity. Emissions will be controlled by the existing 3-stage scrubber system.

Any party to this order (permit) has the right to seek judicial review of the permit pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the EPC in the Legal Department at 3629 Queen Palm Dr., Tampa, Florida 33619; 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 of Appeal must be filed within 30 days from the date this Notice is filed with the clerk of the EPC.

Executed in Tampa, Florida.

Sincerely,

Richard D. Garrity, Ph.D.  
Executive Director

RDG/SRH/srh

cc: Florida Department of Environmental Protection (e-mail)  
John Crowley, P.E. – Griffin Industries, LLC

CERTIFICATE OF SERVICE

This is to certify that this NOTICE OF PERMIT and all copies were mailed before the close of business on \_\_\_\_\_ to the listed persons.

FILING AND ACKNOWLEDGEMENT

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

\_\_\_\_\_  
Clerk

\_\_\_\_\_  
Date

PERMITTEE:  
Griffin Industries, LLC  
1001 Orient Road  
Tampa, FL 33619

PERMIT/CERTIFICATION:  
DRAFT Permit No.: 0570163-004-AC  
County: Hillsborough  
Expiration Date: June 1, 2014  
Project: Replace Cooker #1

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rules 62-204, 62-210, 62-212, 62-296, 62-297, and 62-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the EPC and made a part hereof and specifically described as follows:

For the modification of the rendering operation. Griffin Industries will replace Cooker #1 in the existing rendering process with a larger cooker. The new cooker will be a Dupps Company Supercookor rated at a maximum of 43,440 pounds per hour of raw material input, based on a raw material moisture content of 34%. Additionally, the water-cooled shell and tube condenser for Cooker #1 will be replaced with a larger condenser rated at 16.1 MMBtu/hr to handle the increased steam and condensable malodorous compound loading, and will be tied into the existing three-stage scrubbing system.

Griffin Industries currently processes animal remains, scrap meat, and the interface from used restaurant grease using two (2) high pressure steam heated cookers that are used to separate fat from meat or animal remains by slow heating and processing of meat, fat, bone, and offal. Currently, each cooker has a maximum input rate of 34,000 pounds per hour to produce tallow, yellow grease, and bone meal, based on a raw material moisture content of 34%. The Dupps Company 1500 Equacooker (Cooker #1) will be replaced with a Dupps Company Supercookor, increasing the capacity of Cooker #1 from 34,000 pounds per hour to 43,440 pounds per hour of raw material input. Correspondingly, the existing shell and tube condenser for Cooker #1 will be replaced with a larger condenser which is designed to handle a higher condensable compound loading rate. The new cooker will be of similar design as the existing cooker.

Each cooker has a water-cooled shell and tube condenser to collapse the steam and control condensable odor emissions generated from the cooking operation. The two water-cooled shell and tube condensers operating in parallel are followed by three scrubbers in series; a 10,000 acfm Venturi Scrubber and High Intensity Packed Bed Scrubber to control non-condensable odor emissions from the cookers, and a 50,000 acfm Room Air Scrubber to control the pre-treated process vapors and fugitive vapors from the processing building. The Room Air Scrubber treats

approximately 40,000 acfm of in-plant air and 10,000 acfm of pretreated process vapors from the Venturi and High Intensity Packed Bed scrubbers. The in-plant air emissions consist of emissions from the feed screws, grinders, control wheels, drainers, centrifuges, screw presses, and other miscellaneous process equipment. Sodium hypochlorite is injected as a scrubbing agent in the scrubbers for odor control. In addition, sodium hydroxide and muriatic acid are used for pH control in the scrubbers.

In addition, there is a tertiary odor control system, which uses three atomizing spray nozzles that distribute a mist of odor masking compound around the opening gate at the truck unloading/receiving pit area for the purpose of masking odors in the immediate raw material unloading area. In order to mitigate potential odors, all raw materials are processed within 24 hours of receipt.

Two steam boilers, one rated at 62.76 MMBtu/hr and another rated at 31.38 MMBtu/hr, supply high pressure process steam for use in the two cookers. Both boilers are fired primarily on natural gas with backup of virgin No. 2 fuel oil with less than 0.05% sulfur content by weight. The facility also maintains the ability to combust yellow grease due to its similar heat content to fuel oil. Both of the boilers are exempt from permitting based on Rule 62-210.300(3)(a), F.A.C. and the EPC permit determination letter dated March 6, 2000.

Additionally, there is a Restaurant Food Grease (RFG) processing operation that involves using steam to heat and concentrate the grease by removing water in an evaporator. According to Griffin Industries, this evaporator will be replaced with a similar unit. The RFG operation generates approximately 800 acfm and is tied into the existing scrubber system. This activity is considered to be an insignificant emissions source with respect to the overall rendering process.

The final products from this facility consist of bone meal (crax), tallow, and yellow grease. These products are sold for use in animal feed applications, chemical manufacturing, and combustion applications. Below is a list of the process and pollution control equipment that will be in place upon completion of this air construction permit:

<u>Equipment</u>	<u>Manufacturer</u>	<u>Model No.</u>
Cooker #1	The Dupps Company	Supercookor
Cooker #2	The Dupps Company	1500 Equacooker
Shell and tube condenser #1	Texas Metal Fabrication Company	T-42
Shell and tube condenser #2	The Dupps Company	12 SS
Venturi Scrubber	10,000 ACFM SCP Control, Inc.	8" x 20"
Packed Bed Scrubber	10,000 ACFM GPI Corporation	#4468 60" x 258"
Room Air Scrubber	50,000 ACFM American Fan Co.	BI-490

This project is subject to Rule 62-296.320, General Pollutant Emission Limiting Standards, since it is a source of PM, VOC, visible emissions, and a potential source of odors.

Location: 1001 Orient Road, Tampa, Hillsborough County, FL 33619

Emission Unit No.:

003	Rendering Operation
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References Permit Nos.: 0570163-003-AO and AC29-106753

PERMITTEE:  
Griffin Industries, LLC

Permit/Certification No.: 0570163-004-AC  
Project: Replace Cooker #1

SPECIFIC CONDITIONS:

1. A part of this permit is the attached General Conditions. [Rule 62-4.160, F.A.C.]
2. All applicable rules of the Environmental Protection Commission of Hillsborough County including design discharge limitations specified in the application shall be adhered to. The permit holder may also need to comply with county, municipal, federal, or other state regulations prior to construction. [Rule 62-4.070(7), F.A.C.]
3. Issuance of this permit does not relieve the permittee from complying with applicable emission limiting standards or other requirements of Chapters 62-204, 62-210, 62-212, 62-296 and 62-297, F.A.C., or any other requirements under federal, state, or local law. [Rule 62-210.300, F.A.C.]
4. The permittee shall not cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor. [Rule 62-296.320, F.A.C.]
5. The input rates for each Cooker shall not exceed the following maximum raw material processing rates (lbs/hr) while processing fat, bones, offal, and restaurant grease interface.

		<u>lbs/hr</u>
A)	Cooker #1	43,440
B)	Cooker #2	34,000

[Rule 62-210.200(PTE), 62-4.070(1), F.A.C., and Construction Permit No. AC29-106753]

6. In order to ensure compliance with Specific Condition No. 4, the following shall apply to this rendering operation: [Rule 62-4.070(3), F.A.C. and Permit No. 0570163-003-AO]
  - A) The odor control systems, which include the water-cooled shell and tube condensers and scrubbers, must be properly maintained, and in operation whenever the rendering process is in operation. The odor control system shall be started and fully operational prior to feeding raw materials into the process.
  - B) Raw materials shall be restricted to animal by-products and grease.
  - C) Raw materials shall be processed as soon as reasonably practicable upon delivery to the facility. If raw materials are not processed within 24 hours after delivery to the facility due to an operational breakdown or plant upset, the permittee shall notify the EPC regarding the operational breakdown or plant upset and the estimated time frame for completing processing of raw materials.
  - D) The water in the line returning from either of the two condensers following the cookers shall not exceed 140° F.

PERMITTEE:  
Griffin Industries, LLC

Permit/Certification No.: 0570163-004-AC  
Project: Replace Cooker #1

SPECIFIC CONDITIONS:

7. The following Operation and Maintenance Plan for the odor control systems shall be strictly adhered to: [Rule 62-4.070(1), F.A.C. and Permit No. 0570163-003-AO]

A) The following performance parameters of the sources and the odor control/monitoring system shall be maintained within the specified operating ranges below:

- 1) High Intensity Packed Bed Scrubber pressure drop: 2-8 inches H<sub>2</sub>O
- 2) Room Air Scrubber pressure drop: 1-5 inches H<sub>2</sub>O
- 3) Scrubbing liquid flow rate to the High Intensity Packed Bed Scrubber spray nozzles: minimum of 100 gpm
- 4) Scrubbing liquid flow rate to the Room Air Scrubber nozzles: normal, 450 gpm
- 5) Total liquid flow rate (make up and recirculating) to Venturi Scrubber: Minimum of 40 gpm
- 6) pH of scrubbing liquid to the High Intensity Packed Bed and Room Air Scrubbers: not to exceed 9
- 7) Oxidation-Reduction Potential (ORP) of scrubber liquid to the High Intensity Packed Bed and Room Air Scrubber as measured at the line leading to/supplying spray nozzles: minimum 500 mV (10 ppm)\*
- 8) Cooker Temperature Range: not to exceed 300° F\*

\* The ORP may be operated at a higher mV value, as necessary, in order to minimize objectionable odors. The cooker temperature upper limit may be exceeded up to 320 °F for no longer than 15 minutes in any single hour. Operating under either or both of these conditions does not exempt the permittee from complying with Specific Condition No. 4 of this permit.

B) The following observations, checks, and operations apply to this source and shall be conducted and recorded on the schedule specified:

Daily (While Operating)

- 1) Check the pressure drop across the High Intensity Packed Bed and Room Air Scrubbers (hourly).
- 2) Check the scrubbing liquid flow rate to the Venturi, High Intensity Packed Bed and Room Air Scrubbers (hourly).
- 3) Check the pH of the High Intensity Packed Bed and Room Air Scrubbers scrubbing liquid reservoir (hourly).
- 4) Check the amp meter for the fan serving the Room Air Scrubber.
- 5) Continuously monitor and record the ORP of the scrubbing liquid in the High Intensity Packed Bed and Room Air Scrubbers.
- 6) Continuously monitor and record process temperature of each cooker.

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- 7) Good housekeeping practices shall be adhered to.

Every Other Month:

- 1) Cleaning procedure for High Intensity Packed Bed Scrubber:

- a) Check the packed tower for grease build-up.
- b) Caustic wash the tower with 20-gallons for 2 hours.
- c) Caustic wash the Venturi scrubber with 15-gallons for 2 hours.
- d) Drain both systems - fill with fresh water rinse for 1 hour.
- e) Drain both systems - fill with fresh water add 25 gallons 20% muriatic acid and wash for 3 hours.
- f) Drain both systems - fill with fresh water.
- g) Check ORP and pH probes. Make sure they are clean and verify calibration.
- h) Turn on fan. Make sure pressure drop is reading as permit requires.
- i) Set valves to make sure the circulating pumps read what the permit requires for both systems.
- j) Before leaving system, make sure ORP and pH probes are reading what the permit requires.

- 2) Cleaning Procedure for Room Air Scrubber:

- a) Check packed tower for grease build-up.
- b) Caustic wash tower with 55-gallons for 2 hours.
- c) Drain system fill with fresh water - rinse 1 hour.
- d) Drain system fill with fresh water. Add 55 gallon 20% muriatic acid wash for 3 hours.
- e) Drain system - fill with fresh water.
- f) Check ORP and pH probes. Make sure they are clean and verify calibration.
- g) Turn on fan. Make sure pressure drop is reading as permit requires.
- h) Set valves to make sure the bleed is 10 gpm to outside scrubber.
- i) Before leaving system, make sure ORP and pH probes are reading what the permit requires.

- C) The following maintenance and operation shall apply to this source and shall be conducted on the schedule specified.

Weekly

- 1) Check all the fan bearings and lubricate if needed.

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Monthly

- 1) Check all drive belts and chains for wear and tension.
- 2) Check the High Intensity Packed Bed and Room Air Scrubbers spray nozzles to ensure that there is a proper spray pattern. Repair if necessary.
- 3) Check all hoses and clamps.
- 4) Calibrate all indicating equipment.
- 5) Inspect housing for corrosion.

Quarterly

- 1) Inspect paint on odor control systems.

Annually

- 1) Check all bolts.
- 2) Check welds.
- 3) Calibrate ORP and pH controllers.

D) Records:

Records of inspections, maintenance, and performance parameters required by the specific condition of this permit shall be retained for a minimum of two years and shall be made available to the Environmental Protection Commission of Hillsborough County upon request. [Rule 62-4.070(3), F.A.C.]

8. All reasonable precautions shall be taken to prevent and control generation of unconfined emissions of particulate matter in accordance with the provision in Rule 62-296.320, F.A.C. These provisions are applicable to any source, including, but not limited to, vehicular movement, transportation of materials, construction, alterations, demolition or wrecking, or industrial related activities such as loading, unloading, storing and handling. Reasonable precautions shall include, but not be limited to, the following:

- A) Maintenance of parking areas and yards.
- B) Removal of particulate matter from paved areas, buildings and work areas under control of the owner/operator.

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9. Excess emissions resulting from start-up, shutdown or malfunction of any emissions unit shall be permitted provided that best operational practices to minimize emissions are adhered to; and, the duration of excess emissions shall be minimized but in no case exceed two hours in any 24-hour period. [Rule 62-210.700(1), F.A.C.]

10. If the permittee is not able to comply with any of the provisions of this permit, in particular, maintenance of the operating parameters of the primary and/or secondary odor control systems, then the permittee shall report the problem to the Environmental Protection Commission of Hillsborough County by telephone or in writing no later than the next business day. [Rule 62-4.070(1), F.A.C. and Permit No. 0570163-003-AO]

11. The use of property, facilities, equipment, processes, products, or compounds, or the commission of paint overspraying or any other act, that causes or materially contributes to a public nuisance is prohibited, pursuant to the Hillsborough County Environmental Protection Act, Section 16, Chapter 84-446, Laws of Florida, as Amended.

12. The permittee shall provide timely notification to the Environmental Protection Commission of Hillsborough County prior to implementing any changes that may result in a modification to this permit pursuant to Rule 62-210.200, F.A.C. The changes do not include normal maintenance, but may include, and are not limited to, the following, and may also require prior authorization before implementation: [Rules 62-4.070(1) and 62-210.300, F.A.C.]

- A) Alteration or replacement of any equipment or major component of such equipment.
- B) Installation or addition of any equipment which is a source of air pollution.

13. If the permittee wishes to transfer this permit to another owner, an "Application for Transfer of Air Permit" (DEP Form 62-210.900(7)) shall be submitted, in duplicate, to the Environmental Protection Commission of Hillsborough County within 30 days after the sale or legal transfer of the permitted facility. [Rule 62-4.120, F.A.C.]

14. A minimum of two copies of an application for an air operation permit shall be submitted to the Environmental Protection Commission of Hillsborough County within 90 days of initial operation of the Supercookor, or at least 90 days prior to the expiration date of this permit, whichever occurs first. The application shall also include a copy of the previous three (3) months of records required by this permit. [Rules 62-4.050(2) and 62-210, F.A.C.]

PERMITTEE:  
Griffin Industries, LLC

Permit/Certification No.: 0570163-004-AC  
Project: Replace Cooker #1

SPECIFIC CONDITIONS:

ENVIRONMENTAL PROTECTION COMMISSION  
OF HILLSBOROUGH COUNTY

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Richard D. Garrity, Ph.D.  
Executive Director

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