Florida Department of Environmental Protection

Central District Office
3319 Maguire Blvd., Ste. 232
Orlando, Florida 32803-3767

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr.
Secretary

Electronically Sent- Received Receipt Requested
Naturalway2002@yahoo.com

Mr. Dan Hohmeister, Plant Manager
Natural Organic Products International, Inc.
710 South Rossiter St.
Mt. Dora, FL 32757

Re: Project No. 0690067-005-AC
Natural Organic Products International Facility
Minor Source Air Construction Permit
Project: Replace existing Firebox with a 14.7 MMBTU/hr. burner

Dear Mr. Hohmeister:

On January 13, 2011, you submitted an application requesting construction/installation of a 14.7 MMBTU/hr. burner to replace the existing Firebox. This facility, Natural Organic Products International Facility, is located in Lake County at 710 South Rossiter St. in Mt. Dora, Florida. Enclosed are the following documents: the Technical Evaluation and Preliminary Determination; the Draft Permit and Appendices; the Written Notice of Intent to Issue Air Permit; and the Public Notice of Intent to Issue Air Permit. The Public Notice of Intent to Issue Air Permit is the actual notice that you must have published in the legal advertisement section of a newspaper of general circulation in the area affected by this project. If you have any questions, please contact the project engineer, Mr. Jeff Rustin, P.E., at 407-893-3335.

Sincerely,

Caroline D. Shine
District Air Program Administrator
Central District

Enclosures

CDS/jr

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

In the Matter of an
Application for Air Permit by:

Natural Organic Products International, Inc.
710 South Rossiter St.
Mt. Dora, FL 32757

Project No. 0690067-005-AC
Minor Source Air Construction Permit
Lake County, Florida

Authorized Representative:
Mr. Dan Hohmeister, Plant Manager

Natural Organic Products Int'l
Project: Replace existing Firebox with a 14.7 MMBTU/hr. burner

Facility Location: Natural Organic Products International, Inc. operates the existing Natural Organics Products International facility, which is located in Lake County at 710 South Rossiter St. in Mt. Dora, Florida.

Project: The applicant proposes to construct/install a 14.7 MMBTU/hr burner to replace the existing Firebox. Details of the project are provided in the application and the enclosed Technical Evaluation and Preliminary Determination.

Permitting Authority: Applications for air construction and operation permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210, and 62-212 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Permitting Authority responsible for making a permit determination for this project is the Department of Environmental Protection's Air Resource Management Section in the Central District Office. The Permitting Authority's physical address is: 3319 Maguire Blvd., Ste. 232, Orlando, Florida 32803-3767. The Permitting Authority's mailing address is: 3319 Maguire Blvd., Ste. 232, Orlando, Florida 32803-3767. The Permitting Authority's telephone number is 407/893-3334.

Project File: A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at address indicated above for the Permitting Authority. The complete project file includes the Draft Permit, the Technical Evaluation and Preliminary Determination, the application, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Permitting Authority's project review engineer for additional information at the address or phone number listed above.

Notice of Intent to Issue Permit: The Permitting Authority gives notice of its intent to issue an air permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of the proposed equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C. The Permitting Authority will issue a Final Permit in accordance with the conditions of the proposed Draft Permit unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S. or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

Public Notice: Pursuant to Section 403.815, F.S. and Rules 62-110.106 and 62-210.350, F.A.C.,

you (the applicant) are required to publish at your own expense the enclosed Public Notice of Intent to Issue Air Permit (Public Notice). The Public Notice shall be published one time only as soon as possible in the legal advertisement section of a newspaper of general circulation in the area affected by this project. The newspaper used must meet the requirements of Sections 50.011 and 50.031, F.S. in the county where the activity is to take place. If you are uncertain that a newspaper meets these requirements, please contact the Permitting Authority at above address or phone number. Pursuant to Rule 62-110.106(5) and (9), F.A.C., the applicant shall provide proof of publication to the Permitting Authority at the above address within 7 days of publication. Failure to publish the notice and provide proof of publication may result in the denial of the permit pursuant to Rule 62-110.106(11), F.A.C.

Comments: The Permitting Authority will accept written comments concerning the proposed Draft Permit for a period of 14 days from the date of publication of the Public Notice. Written comments must be received by the Permitting Authority by close of business (5:00 p.m.) on or before the end of the 14-day period. If written comments received result in a significant change to the Draft Permit, the Permitting Authority shall revise the Draft Permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection.

Petitions: A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000 (Telephone: 850/245-2241). Petitions filed by the applicant or any of the parties listed below must be filed within 14 days of receipt of this Written Notice of Intent to Issue Air Permit. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within 14 days of publication of the attached Public Notice or within 14 days of receipt of this Written Notice of Intent to Issue Air Permit, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within 14 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 (in a proceeding initiated by another party) 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 Permitting Authority'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; the name, address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of when and how each petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact. If there are none, the petition must so state; (e) A concise statement of the ultimate facts alleged,

including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority'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 Permitting Authority's final action may be different from the position taken by it in this Written Notice of Intent to Issue Air Permit. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation: Mediation is not available in this proceeding.

Executed in Orange County, Florida.

Caroline D. Shine

Caroline D. Shine
District Air Program Administrator
Central District

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Written Notice of Intent to Issue Air Permit package (including the Written Notice of Intent to Issue Air Permit, the Public Notice of Intent to Issue Air Permit, the Technical Evaluation and Preliminary Determination and the Draft Permit) was sent by electronic mail (or a link to these documents made available electronically on a publicly accessible server) with received receipt requested before the close of business on March 8, 2011 to the persons listed below.

Mr. Dan Hohmeister, Plant Manager, NOPI, Inc.(Naturalway2002@yahoo.com)
Mr. Joseph Stine, P.E., Consulting Engineer **(stinejoe@bellsouth.net)**

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.

Dina Jones (Clerk) 03/08/2011 (Date)

PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT

Florida Department of Environmental Protection
Air Resource Management, Central District Office
Draft Major Source Air Construction Permit
Project No. 0690067-005-AC
Natural Organic Products International, Inc., Natural Organic Products International Facility
Lake County, Florida

Applicant: The applicant for this project is Natural Organic Products International, Inc. The applicant's authorized representative and mailing address is:

Mr. Dan Hohmeister, Plant Manager
Natural Organic Products International, Inc.
710 S. Rossiter St.
Mt. Dora, FL 32757

Facility Location: Natural Organic Products Int'l, Inc. operates the existing Natural Organic Products Int'l Facility, which is located in Lake County at 710 S. Rossiter St. in Mt. Dora, FL.

Project: This project is for the installation of a 14.7 MMBTU/hr. burner to replace the Firebox.

Permitting Authority: Applications for air construction and operation permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210 and 62-212 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Permitting Authority responsible for making a permit determination for this project is the Department of Environmental Protection's Air Resource Management Section in the Central District Office. The Permitting Authority's physical address is: 3319 Maguire Blvd., Ste. 232, Orlando, FL 32803-3767. The Permitting Authority's mailing address is: 3319 Maguire Blvd., Ste. 232, Orlando, FL 32803-3767. The Permitting Authority's telephone number is 407/893-3334.

Project File: A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at the physical address indicated above for the Permitting Authority. The complete project file includes the Draft Permit, the Technical Evaluation and Preliminary Determination, the application and information submitted by the applicant (exclusive of confidential records under Section 403.111, F.S.). Interested persons may contact the Permitting Authority's project engineer for additional information at the address and phone number listed above. In addition, electronic copies of these documents are available on the following web site: http://www.dep.state.fl.us/air/emission/apds/default.asp.

Notice of Intent to Issue Air Permit: The Permitting Authority gives notice of its intent to issue an air construction permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of proposed equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297, F.A.C. The Permitting Authority will issue a Final Permit in accordance with the conditions of the proposed Draft Permit unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S. or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

Comments: The Permitting Authority will accept written comments concerning the proposed Draft Permit for a period of 14 days from the date of publication of this Public Notice. Written comments must be received by the Permitting Authority by close of business (5:00 p.m.) on or before the end of the 14-day period. If written comments received result in a significant change to the Draft Permit, the Permitting Authority shall revise the Draft Permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection.

Petitions: A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000 (Telephone: 850/245-2241). Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S. must be filed within 14 days of publication of this Public Notice or receipt of a written notice, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within 14 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 (in a proceeding initiated by another party) 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 Permitting Authority'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; the name address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial rights will be affected by the agency determination; (c) A statement of when and how the petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact. If there are none, the petition must so state; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority'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 Permitting Authority's final action may be different from the position taken by it in this Public Notice of Intent to Issue Air Permit. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation: Mediation is not available for this proceeding.

TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION

APPLICANT

Natural Organic Products International, Inc.
710 South Rossiter St.
Mt. Dora, FL 32757

Natural Organic Products International Facility

Facility ID No. 0690067

PROJECT

Project No. 0690067-005-AC
Application for Minor Source Air Construction Permit
Project Name: Replace existing Firebox with 14.7 MMBTU/hr. burner

COUNTY

Lake County, Florida

PERMITTING AUTHORITY

Florida Department of Environmental Protection
Air Resource Management
Central District Office
3319 Maguire Blvd., Ste. 232, Orlando, FL 32803-3767

March 4, 2011

Prepared by Jeffrey Rustin, P.E.

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 (Department) 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 construction permits are required pursuant to Rules 62-4, 62-210 and 62-212, 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 Department adopts these federal regulations on a quarterly basis in Rule 62-204.800, F.A.C.

Glossary of Common Terms

Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of this permit.

I. Project Description:

A. Applicant:

Mr. Dan Hohmeister, Plant Manager
Natural Organic Products International, Inc.
710 South Rossiter St.
Mt. Dora, FL 32757

B. Professional Engineer:

Mr. Joseph Stine, P.E.
P.O. Box 2869
Orlando, FL 32802-2869

C. Project Location:

Natural Organic Products International Facility
710 South Rossiter St.
Mt. Dora, FL 32757

D. Project Summary:

Replace existing firebox with 14.7 MMBTU/hr. burner.

E. Application Information:

Application Received on: 01/13/2011
Application Complete: 01/13/2011

II. PSD Applicability for Project

As provided in the application, the following table summarizes potential emissions and PSD applicability for the project.

Table A. Potential Emissions (Tons/Year) and PSD Applicability

Pollutant	Project Potential Emission (tpy)	Significant Emissions Rate (tpy)	Subject to PSD?
CO (facility/project)	0.69/0	100	No
NH3 (facility/project)	1.31/0	N/A	No
NOx (facility/project)	2.73/0	40	No
PM (facility/project)	30.13/0	25	No
PM10 (facility/project)	26.37/0	15	No

As shown in the above table, total project emissions do not exceed the PSD significant emissions rates. (See Section IV. Summary of Emissions).

III. Rule Applicability

This project is subject to the preconstruction review requirements of Chapter 403, Florida Statutes and Chapters 62-204 through 62-297, Florida Administrative Code (F.A.C.), as indicated below.

Subject to:	Y/N	Comments
Rule 62-210.300, F.A.C. - Project Not Subject to Prevention of Significant Deterioration or Nonattainment Requirements, F.A.C.	Y	Facility is not exempt from general permitting requirements.
Rule 62-212.400, F.A.C. - Prevention of Significant Deterioration	N	Facility is not a PSD major source.
Rule 62-296.320(4)(b), F.A.C. - General Particulate Emission Limiting Standards	Y	Facility is a source of particulate emissions.
Rules 62-296.320(1) and (2), F.A.C. - General Pollutant Emission Limiting Standards (Odor)	Y	Facility is a source of odors.
Rule 62-296.400, F.A.C. - Stationary Source Emission Standards	N	There is no applicable source category.
Rule 62-296.500, F.A.C. - Reasonably Available Control Technology (VOC)	N	Lake County is an attainment area for ozone.
Rule 62-296.700, F.A.C. - Reasonably Available Control Technology (PM)	N	There is no applicable source category.
Rule 62-204.800, F.A.C. - Standards of Performance for New Stationary Sources (NSPS)	N	There is no applicable source category.
Rule 62-204.800, F.A.C. National Emission Standard for Hazardous Air Pollutants (NESHAPS – 40 CFR 61)	N	There is no applicable source category.
Rule 62-204.800, F.A.C. National Emission Standard for Hazardous Air Pollutants for Source Categories a.k.a. MACT (NESHAPS – 40 CFR 63)	N	There is no applicable source category.
Chapter 62-213, F.A.C. - Operation Permits for Major Sources of Air Pollution	N	Facility is a minor facility.
Rule 62-297.310, F.A.C. - General Compliance Test Requirements, F.A.C.	N	Testing is not required until operating permit renewal.

IV. Summary of Emissions

Pollutant	EU No. and brief description	Potential Emissions (tpy)	Allowable Emissions (tpy, opacity)
CO	EU No. 001- Facility	0.69	
	Total	0.69	
PM	EU No. 001- Facility	30.13	
	Total	**30.13**	
PM10	EU No. 001- Facility	26.37	
	Total	**26.37**	
Individual HAP (NH3)	EU No. 001- Facility	1.31	
	Total	**1.31**	
VE	EU No. 001- Facility	100%	20%

V. Federal NSPS and/or NESHAP Provisions

A. Not applicable to project or facility.

VI. Conclusions

The emission limits proposed by the applicant will meet all of the requirements of Chapters 62-204 through 297, F.A.C.

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

VII. Preliminary Determination

The Department makes a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations as conditioned by the draft permit. This determination is based on a technical review of the complete application, reasonable assurances provided by the applicant, and the conditions specified in the draft permit. Additional details of this analysis may be obtained by contacting the project engineer at the Florida Department of Environmental Protection Air Resource Management, Central District, 3319 Maguire Blvd., Ste. 232, Orlando, FL 32803-3767.

Pursuant to Section 403.087, Florida Statutes and Section 62-4.070, Florida Administrative Code, the Department 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).

Florida Department of Environmental Protection

Central District
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803-3767

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr.
Secretary

E-CORRESPONDENCE
naturalway2002@yahoo.com

DRAFT PERMIT

PERMITTEE
Natural Organic Products International, Inc.
710 S. Rossiter Street
Mount Dora, FL 32757

Authorized Representative:
Dan Hohmeister, Plant Manager

Air Permit No.: 0690067-005-AC
Permit Expires: June 30, 2012
Natural Organic Products International facility
Minor Source Air Construction Permit – Replace Firebox with 14.7 MMBTU/hr. burner

This air construction permit authorizes Natural Organic Products International, Inc. to replace the existing Firebox with a 14.7 MMBTU/hr burner. The replacement burner is considered exempt under 62-210.300(3)(a)34., F.A.C. The facility dries and granulates natural materials and lignite and uses molasses as a binding agent. The process includes a fertilizer component dryer and granulator equipped with a cyclone dust collector and a high efficiency wet scrubber. Fugitive dust associated with a materials handling elevator are controlled by a misting system. The facility is located in Lake County at 710 S. Rossiter Street, Mount Dora, Florida. The Latitude/Longitude coordinates are 28° 47′ 26.98″ N/81° 37′ 54.79″ W.

This 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.

A person whose substantial interests are affected by this permit may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-3000, within 14 days of receipt of this Permit. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

The petition shall contain the following information:

(a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department permit file number and the county in which the project is proposed;

(b) A statement of how and when each petitioner received notice of the Department's action or proposed action;

(c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;

(d) A statement of the material facts disputed by petitioner, if any;

(e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;

(f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and

(g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this permit. Persons whose substantial interests will be affected by any decision of the Department with regard to the application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of receipt of this notice in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

This permit is final and effective on the date filed with the Clerk of the Department unless a petition is filed in accordance with the above paragraphs or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition and conforms to Rule 62-103.070, F.A.C. Upon timely filing of a petition or a request for an extension of time this permit will not be effective until further Order of the Department.

When the Order (Permit) is final, any party to the Order has the right to seek judicial review of the Order 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 Department in the Office of General Counsel, 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-3000; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 days from the date the Final Order is filed with the Clerk of the Department.

Executed in Orlando, Florida

DRAFT PERMIT

_____
Caroline D. Shine
Program Administrator
Air Resource Management

Date: _____

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Air Permit package was sent by electronic mail (or a link to these documents made available electronically on a publicly accessible server) with received receipt requested before the close of business on _____ to the persons listed below.

Dan Hohmeister, Plant Manager, Natural Organic Products International, Inc.
(naturalway2002@yahoo.com)
Joseph P. Stine, P.E., Project Engineer **(stinejoe@bellsouth.net)**

Clerk Stamp

FILED on this date, pursuant to Section 120.52 F.S., with the designated Department Clerk, receipt of which is hereby acknowledged.

_____ _____
Clerk Date

CS/jr

FACILITY AND PROJECT DESCRIPTION

Existing Facility

The facility is a Fertilizer Manufacturing Facility. The existing facility consists of the following emissions units.

Facility ID No. 0690067	
ID No.	**Emissions Unit Description**
001	Fertilizer Manufacturing Facility that includes a fertilizer component dryer and granulator equipped with a cyclone dust collector and a high efficiency wet scrubber. Fugitive dust associated with a materials handling elevator are controlled by a misting system.

Project

This project is for the replacement of the existing Firebox with a 14.7 MMBTU/hr burner. This project will modify the following emission unit.

Facility ID No. 0690067	
ID No.	**Emissions Unit Description**
001	Fertilizer Manufacturing Facility that includes a fertilizer component dryer and granulator equipped with a cyclone dust collector and a high efficiency wet scrubber. Fugitive dust associated with a materials handling elevator are controlled by a misting system.

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 classified as a minor source.

SECTION 2. ADMINISTRATIVE REQUIREMENTS

1. Permitting Authority: The permitting authority for this project is the Florida Department of Environmental Protection, Central District Office. The Central District Office's mailing address is 3319 Maguire Blvd., Suite 232, Orlando, Florida 32803-3767. The phone numbers for Permitting Section are 407-893-3335 or 407-893-3334. All documents related to applications for permits to operate an emissions unit shall be submitted to the Central District Office.

2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Central District Office. The mailing address of the Central District Office is: 3319 Maguire Blvd., Suite 232, Orlando, Florida 32803-3767. The phone number for Compliance Section is 407-893-3333.

3. Appendices: The following Appendices are attached as part of this permit:

   a. Appendix A. Citation Formats and Glossary of Common Terms;

   b. Appendix B. General Conditions;

   c. Appendix C. Common Conditions; and

   d. Appendix D. Common Testing Requirements. (if applicable)

   e. Appendix E. Permit Application

4. Applicable Regulations, Forms and Application Procedures: Unless otherwise specified in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.

5. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]

6. Modifications: The permittee shall notify the Compliance Authority 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 Department. 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 Non-Title V Air Operation Permit: This permit authorizes construction or modification of the permitted emissions unit(s) and initial operation to determine compliance with Department rules. A Non-Title V air operation permit (revision) is required for continued operation of the permitted emissions unit(s). The permittee shall apply for a Non-Title V air operation permit (revision) no later than 90 days prior to expiration of this permit. To apply for a Non-Title V air operation permit (revision), the applicant shall submit the following:**

   a. **the appropriate permit application form** ***(see current version of Rule 62-210.900, F.A.C. (Forms and Instructions), and/or FDEP Division of Air Resource Management website at: http://www.dep.state.fl.us/air/)***; **and**

   b. **the appropriate operation permit application fee from Rule 62-4.050(4)(a), F.A.C.**

The application shall be submitted to the Permitting Authority.

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

A. Fertilizer Manufacturing Facility

This section of the permit addresses the following emissions unit.

ID No.	Emissions Unit Description
001	Fertilizer Manufacturing Facility that includes a fertilizer component dryer and granulator equipped with a cyclone dust collector and a high efficiency wet scrubber. Fugitive dust associated with a materials handling elevator are controlled by a misting system.

EQUIPMENT

A.1. Equipment Description: The permittee may continue to operate a Fertilizer Component Manufacturing Facility. The facility dries and granulates natural materials and lignite and uses molasses as a binding agent. The process includes a fertilizer component dryer and granulator equipped with a cyclone dust collector and a high efficiency wet scrubber. Fugitive dust associated with a materials handling elevator are controlled by a misting system.

PERFORMANCE RESTRICTIONS

A.2. Permitted Capacity: The maximum dryer material loading rate is 188,340 tons per any consecutive 12-month period.
[Rules 62-210.200, F.A.C. - Definitions - (PTE) and 62-4.070(3), F.A.C.]

{Permitting Note: 21.5 tons/hr x 8760 hrs/yr = 188,340 tons/yr.}

A.3. Permitted Fuel Consumption: The maximum permitted heat input rate to the burner is 128,772 MMBTU per any consecutive 12-month period.
[Rules 62-210.200, F.A.C. - Definitions - (PTE) and 62-4.070(3), F.A.C.]

A.4. Authorized Fuel: The burner shall be fired with natural gas only.

A.5. Restricted Operation: The hours of operation of are not limited (8760 hours per year).
[Rules 62-210.200, F.A.C. - Definitions - (PTE) and 62-4.070(3), F.A.C.]

A.6. No person shall circumvent any pollution control device or allow the emissions of air pollutants without the applicable air pollution control device operating properly.
[Rule 62-210.650, F.A.C.]

NOTIFICATION REQUIREMENTS

A.7. Notification of Operation Commencement: The permittee shall notify the Compliance Authority in writing of the date of commencing operation of the 14.7 MMBTU/hr. burner, no later than five (5) business days after that date.
[Rule 62-4.070, F.A.C., and Rule 62-210.200, F.A.C., (Definition of Commence Operation)]

EMISSIONS LIMITS AND STANDARDS

A.8. The visible emissions from each particulate emission point must comply with Rule 62-296.320(4)(b)1., F.A.C. (limited to less than 20% opacity).

A.9. Reasonable Precautions of Unconfined Emissions of Particulate Matter: All reasonable precautions shall be taken to prevent and control generation of unconfined emissions of particulate matter (PM). These provisions are applicable to any source, including but not limited to, vehicular movement, transportation of materials, construction, alteration, demolition or wrecking, or industrial-related activities such as loading, unloading, storing, and handling. Reasonable precautions to be taken shall include, but not be limited to the following:

a) Paving and maintenance of roads, parking areas, and yards;
b) Application of water or chemicals to control emissions from such activities as demolition of buildings, grading roads, construction, and land clearing;
c) Application of asphalt, water, oil, chemicals, or other dust suppressants to unpaved roads, yards, open stock piles, and similar activities;
d) Removal of PM from roads and other paved areas under the control of the owner or operator of the facility to prevent re-entrainment, and from building(s) or work areas to prevent particulate from becoming airborne;
e) Landscaping or planting of vegetation;
f) Sprinkling with water shall be used as necessary on paved areas, unpaved areas, stockpiles, and during loading/unloading operations;
g) Prevent emissions from material handling by a loader shall be achieved by reducing the material freefall as the bucket dumps the aggregate. Drop heights shall be minimized from conveyors and screens; and
h) Enclosure or covering of conveyor systems.

A.10. No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor. An objectionable odor is defined as any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance.
[Rules 62-210.200(214) and 62-296.320(2), F.A.C.]

TESTING REQUIREMENTS

A.11. Compliance Tests: Each particulate emission point must be tested for visible emissions at least 90 days prior to the permit expiration date.
[Rule 62-297.310(7)(a)3., F.A.C.]

A.12. Test Requirements: The permittee shall notify the Compliance Authority, at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner. Tests shall be conducted in accordance with the applicable requirements specified in Appendix D (Common Testing Requirements) of this permit. [Rule 62-297.310(7)(a)9., F.A.C.]

A.13. Test Method: Required tests shall be performed in accordance with the following reference method.

Method	Description of Method and Comments
EPA Method 9	Visual Determination of the Opacity of Emissions from Stationary Sources: Shall be conducted for thirty minutes or the length of the batch/cycle if less than 30 minutes.

The above method is described in Appendix A of 40 CFR 60 and are adopted by reference in Rule 62-204.800, F.A.C. No other method may be used unless prior written approval is received from the Department. [Rules 62-204.800 and 62-297.100, F.A.C.; and Appendix A of 40 CFR 60]

A.14. The maximum permitted operating rate for the dryer is 21.5 tons/hour while being fired at a maximum rate of 14.7 MMBTU/hour. Testing of emissions shall be conducted with the emissions unit operation at permitted capacity. Permitted capacity is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impractical to test at permitted capacity, an emissions unit may be tested at less than the minimum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test load until a new test is conducted. Once the unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity.
[Rule 62-297.310(2), F.A.C.]

A.15. A water flow meter, water pressure gauge and a differential pressure gauge are required to measure the water flow and pressure to the scrubber and the pressure drop across the scrubber a minimum of 10 days before the compliance testing is performed.
[Rule 62-297.310(5), F.A.C.]

RECORDS AND REPORTS

A.16. In order to demonstrate compliance with Specific Condition Numbers A.2., A.3., and A.4. of this permitting section and general condition number 14.c. as specified in Appendix B (General Conditions) of this permit, the permittee shall maintain a log at the facility for a period of at least 5 years from the date the data is recorded. The log shall contain the following:

Monthly

a) designation of the month and year of operation for which the records are being tabulated;
b) consecutive 12-month total of material loaded (lignite or magnetite ore with molasses);
c) consecutive 12-month total of dryer heat input; and
d) consecutive 12-month total of natural gas combusted

Note: A consecutive 12 months total is equal to the total for the month in question plus the totals for the eleven months previous to the month in question. A consecutive 12-months total treats each month of the year as the end of a 12-months period. A 12-months total is not a year-to-date total. Facilities that have not been operating for 12 months should retain 12 months totals using whatever number of months of data are available until such a time as a consecutive 12 months total can be maintained each month. **The monthly logs shall be completed by the end of the following month.**
[Rule 62-4.070(3), F.A.C.]

A.17. Test Reports: Reports of the required compliance tests shall be filed with the air compliance section of this office as soon as practical but no later than 45 days after the last sampling run of each test is completed. The permittee shall prepare and submit reports for all required tests in accordance with the requirements specified in Appendix D (Common Testing Requirements) of this permit.
[Rule 62-297.310(8), F.A.C.]

A.18. Annual Operating Report: An Annual Operating Report is required to be completed and submitted for this facility as specified in Appendix C (Common Conditions) of this permit.
[Rule 62-210.370(3), F.A.C.]