



Florida Department of Environmental Protection

Central District
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Orlando, Florida 32803-3767

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FINAL 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. Belt conveyors replaced the materials handling elevator, reducing dust emissions. 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.

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AIR CONSTRUCTION PERMIT (FINAL)

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.

AIR CONSTRUCTION PERMIT (FINAL)

Executed in Orlando, Florida



Caroline D. Shine
Program Administrator
Air Resource Management

Date: 4/6/11

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 4/6/11 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.

 4/6/11
Clerk Date

CS/jr

SECTION 1. GENERAL INFORMATION (FINAL)

FACILITY AND PROJECT DESCRIPTION

Existing Facility

The facility is a Fertilizer Manufacturing Facility. The existing facility consists of the following emissions 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. Belt conveyors replaced the materials handling elevator, reducing dust emissions.

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. Belt conveyors replaced the materials handling elevator, reducing dust emissions.

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 (FINAL)

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.

SECTION 2. ADMINISTRATIVE REQUIREMENTS (FINAL)

(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.]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS (FINAL)

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. Belt conveyors replaced the materials handling elevator, reducing dust emissions.

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. Belt conveyors replaced the materials handling elevator, reducing dust emissions.

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)]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS (FINAL)

A. Fertilizer Manufacturing Facility

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.]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS (FINAL)

A. Fertilizer Manufacturing Facility

- 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.]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS (FINAL)

A. Fertilizer Manufacturing Facility

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.]