Department of
Environmental Protection

Jeb Bush
Governor

Northeast District
7825 Baymeadows Way, Suite B200
Jacksonville, Florida 32256-7590

Colleen Castille
Secretary

PERMITTEE:

Madison Packing Acquisition Sub Inc./
Smithfiled-Madison
4611 Lykes Road
Plant City, Florida 33655

I.D. Number:	0790023
Permit/Cert Number:	0790023-002-AO
Date of Issue:	April 4, 2006
Expiration Date:	April 4, 2011
County:	Madison
Latitude/Longitude:	30°29' 12"N; 83°24' 41" W
UTM:	E-(17)270.83; N-3374.96
Project:	Initial Air Operating Permit Meat Processing Plant

This permit is issued under the provisions of Chapter(s) 403, Florida Statutes, and Florida Administrative Code Rule(s) 62-210, 62- 204, 62-272, 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 department and made a part hereof and specifically described as follows:

Project No. 002: Existing facility with the exception of two hot water heaters installed under Air Construction Permit No. 0790023-001-AC. One of the hot water heaters (3.5 MMBtu/hour), is exempted from permitting under Rule 62-210.300(3)(a)2., F.A.C. The other Hot Water Heater has a maximum heat input of 15 MMBtu/ hr. This Operating permit is also for three existing boilers (Boilers No. 1, 2 and 3), 12 Smokehouses, two Frankfurter Tunnels, Serpentine Meat Cooker, Salt Unloading, Storage and Transfer System. Boiler No. 2 is an exempt unit with a maximum heat input of 3.34 MMBtu/ hr.

FACILITY DESCRIPTION

Emission Units and Points are identified as follows:

Emission Unit	Description
001	Boiler No. 1
002	Boiler No. 3
003	Hot Water Heater

The following emissions units are affected facilities pursuant to 40 CFR 60 Subpart Dc - Standards of Performance for Small Industrial- Commercial- Institutional Steam Generating Units:

Emission Unit	Description
002	Boiler No. 3
003	Hot Water Heater

Exempt Emission Sources:

Hot Water Heater: Maximum heat input rate is 3.5 MMBtu/hr.
Boiler No. 2: Maximum heat input rate is 3.45 MMBtu/hr.

Permittee:

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REGULATORY CLASSIFICATION

40 CFR 60 Subpart Dc - Standards of Performance for Small Industrial- Commercial- Institutional Steam Generating Units; Rule 62-296.406- Fossil Fuel Steam Generators with Less Than 250 MMBtu/hr Heat Input, and 40 CFR 60, Subpart A - General Provisions Requirements.

This facility **is not** subject to 40 CFR 63 Subpart DDDDD **-** National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters, because it **is not** a major source of HAPs.

POLLUTANTS

PM and SO_2

OPERATING LOCATION

The facility is operating at 294 SW Harvey Green Drive, Madison, Madison County, Florida.

RELEVANT DOCUMENTS

The documents listed below are the basis of the permit. They are specifically related to this permitting action. These documents are on file with the Department.

Application for Air Construction Permit- Non-Title V Source received November 4, 2004.
Comments from Mr. Doug Crouser, Lykes Meat Group Inc. received February 18, 2005.
Air Construction Permit- Non-Title V Source issued 3/30/05.
Application for Air Operation Permit- Non-Title V Source received January 3, 2006.
Request For Additional Information Dated January 30, 2006.
Additional Information received on February 10, 2006.
Request For Additional Information Dated February 27, 2006.
Additional Information received on March 23, 2006.

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of the conditions.

2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.

3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.

4. This permit conveys not title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.

5. This permit does no relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permitted to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:

   a. Have access to and copy any record that must be kept under the conditions of the permit;

   b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and

   c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:

a. a description of and cause of non-compliance; and

b. the period of non-compliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

12. This permit or a copy thereof shall be kept at the work site of the permitted activity.

13. This permit also constitutes:

(X) Determination of Best Available Control Technology (BACT)
( ) Determination of Prevention of Significant Deterioration (PSD)
(X) Compliance with New Source Performance Standards (NSPS)

GENERAL CONDITIONS:

14. The permittee shall comply with the following:

a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.

b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.

c. Records of monitoring information shall include:

- the date, exact place, and time of sampling or measurements;
- the person responsible for performing the sampling or measurement;
- the dates analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and
- the results of such analyses.

15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

SPECIFIC CONDITIONS:

ESSENTIAL POTENTIAL TO EMIT (PTE) PARAMETERS

1. **Hours of Operation (All EUs)** The hours of operation for Natural Gas and Liquefied Petroleum Gas usage are **not limited** (**8,760 hours/year**).

   Hours of Operation for No. 2 Fuel Oil (EU001 & 002): No. 2 Fuel Oil is limited to (**4,380 hours/year**) and shall be recorded.

[Rules 62-4.160(2), 62-210.200(PTE), F.A.C., Air Construction Permit No. 0790023-001-AC issued 03/30/05.]

2. **The Maximum Rate**: The maximum rates are listed below and **shall not** be exceeded without prior Department japproval.

EU	Fuel Options	Maximum Operating Rate	Combined Maximum Heat Input Rate
001 Boiler No. 1	No. 2 fuel oil [1] Natural Gas[2] Liquefied Petroleum Gas[3]	545,070 gal/year 147,170,000 ft^3/year 1,626,200 gal/year	16.8 (MMBtu/hr) [4]
002 Boiler No. 3	No. 2 fuel oil [1] Natural Gas[2] Liquefied Petroleum Gas[3]	543,060 gal/year 146,620,000 ft^3/year 1,620,200 gal/year	16.74 (MMBtu/hr) [4]
003 Hot Water Heater	Natural Gas[2] Liquefied Petroleum Gas[3]	131,400,000 ft^3/year 1,452,000 gal/year	15 (MMBtu/hr)[4]

[1] Heating Value of No. 2 Fuel Oil 135,000 Btu/gal
[2] Heating Value of Natural Gas 1,000 Btu/ft^3
[3] Heating Value of Liquefied Petroleum Gas 90,500 Btu/gal
[4] Combined Maximum Heat Input Rate (MMBtu/hr) for all fuels
[Rule 62-210.200(PTE); Air Construction Permit No. 0790023-001-AC issued 03/30/05]

EMISSION LIMITATIONS AND PERFORMANCE STANDARDS

4. **Visible Emissions (All EUs).** Visible emissions shall not exceed 20% opacity except for one six-minute period per hour during which opacity shall not exceed 27 percent.

[Rule 62-296.406(1), F.A.C., and Air Construction Permit No. 0790023-001-AC issued 03/30/05]

5. Sulfur Dioxide (All EUs): Sulfur dioxide emissions from No. 2 Fuel Oil shall not exceed 0.05% sulfur by weight.
[Rule 62-296.406(3), F.A.C.; Best Available Control Technology (BACT)]

Sulfur Dioxide (EUs 002 & 003):

Sulfur dioxide emissions shall not exceed 215 ng/J (0.50 lb/million Btu heat input) while combusting oil; or as an alternate, these units may not combust oil that contains greater than 0.05 weight percent sulfur. The SO_2 emission limits and fuel oil sulfur limits apply at all times while combusting oil, including periods of startup, shutdown, and malfunction.
[Rules 62-296.406(3), F.A.C. and 62-204.800(8)(b)4., F.A.C.; 40 CFR 60.42c(d)- Subsumed; Best Available Control Technology (BACT); 40 CFR 60.42c(i); Air Construction Permit No. 0790023-001-AC issued 03/30/05]

EU 002: Compliance with the emission limits or fuel oil sulfur limits under this section shall be determined based on a certification from the fuel supplier, as described under 40 CFR 60.48c(f)(1).
[40 CFR 60.42c(h)(1)]

EU 003: Compliance with the fuel oil sulfur limits and emission limits of this section shall be determined on a 30-day rolling average basis.
[40 CFR 60.42c(g)]

{Permit Note: 40 CFR Part 60, Subpart Dc only requires the facility to combust fuel oil with a sulfur content of 0.5% sulfur content or less. However, to meet the requirements of Subpart Dc and 62-296.406, F.A.C., this facility is limited to the combustion of fuel oil with 0.05% sulfur content or less.}

6. Particulate Matter (All EUs): Particulate matter emissions shall be controlled by firing low sulfur content liquid fuel.
[Rule 62-296.406(2), F.A.C; and Best Available Control Technology (BACT)]

COMPLIANCE MONITORING AND TESTING REQUIREMENTS

7. Testing Test the emissions for the following pollutant(s) during each federal fiscal year (October 1-September 30). Notify the Department 15 days prior to testing.
Tests and test reports shall comply with the requirements of FAC Rules 62-297.310(8) and 62-297.401, respectively.

EU 001

Pollutant	Test Interval	Test Method
Visible Emissions	Annually[1]	EPA 9[2]
SO_2 - Sulfur Content	---	Certified ASTM fuel oil analysis of the oil delivered is acceptable [3]

[1] Rule 62-297.310(7)(a)4.
[2] Rule 62-297.401(9)(a)
[3] Specific Condition No. 5

SPECIFIC CONDITION NO. 7 continued:

EU 002

Pollutant	Test Interval	Test Method
Visible Emissions	Annually[1]	EPA 9[2]
SO_2 - Sulfur Content	---	Fuel Supplier Certification[3]

[1] Rule 62-297.310(7)(a)4.
[2] Rule 62-297.401(9)(a)
[3] Specific Condition No. 7 and 40 CFR 60.44c(h).

Fuel Supplier Certification for distillate oil shall include the name of the oil supplier and a statement from the oil supplier that the oil complies with the specifications for fuel oil numbers 1 or 2, as defined by the American Society for Testing and Materials in ASTM D396-78, 89,90,92,96,or98, "Standard Specification for Fuel Oils."
[40 CFR 60.48c(f)(1)]

EU 003

Pollutant	Test Interval	Test Method
Visible Emissions	Annually[1]	EPA 9[2]
SO_2 - Sulfur Content	---	Shipment Fuel Sampling[3]

[1] Rule 62-297.310(7)(a)4.
[2] Rule 62-297.401(9)(a)
[3] Specific Condition No. 7 and 40 CFR 60.44c(g).

Shipment Fuel Sampling: The owner or operator of the affected facility shall sample the oil in the fuel tank after each new shipment of oil is received. Oil samples may be collected from the fuel tank for each steam generating unit immediately after the fuel tank is filled and before any oil is combusted. The owner or operator of the affected facility shall analyze the oil sample to determine the sulfur content of the oil. If a partially empty fuel tank is refilled, a new sample and analysis of the fuel in the tank would be required upon filling. Results of the fuel analysis taken after each new shipment of oil is received shall be used as the daily value when calculating the 30-day rolling average until the next shipment is received. If the fuel analysis shows that the sulfur content in the fuel tank is greater **than 0.05 weight percent sulfur**, the owner or operator shall ensure that the sulfur content of subsequent oil shipments is low enough to cause the 30-day rolling average sulfur content to **be 0.05 weight percent sulfur or less**.
[40 CFR 60.44c(g); 40 CFR 60.46c(d)(2) and Best Available Control Technology (BACT)]

8. <u>Operation During Compliance Test (All EUs)</u>: Unless otherwise stated in the applicable emission limiting standard rule, testing of emissions shall be conducted with the emissions unit operating at permitted capacity as defined below. 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. Permitted capacity is defined as 90 to 100 percent of the maximum operation rate allowed by the permit.
[Rule 62-297.310(2)(b), F.A.C.]

9. Compliance Test Procedures (All EUs): 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 test is completed.
[Rule 62-297.310(8), F.A.C.]

REPORTING AND RECORDKEEPING REQUIREMENTS

10. (EU 002 & 003): The owner or operator of each affected facility subject to the SO_2 emission limits of § 60.42c shall submit to the Administrator the performance test data from any subsequent performance tests.
[40 CFR 60.48c(b)]

11. (EU 002 & 003): The owner or operator of each affected facility subject to the SO_2 emission limits and/or fuel oil sulfur limits under § 60.42c shall submit reports to the Administrator.
[40 CFR 60.48c(d)]

12. (EU 002 & 003): The owner or operator of each affected facility shall record and maintain records of the amounts of each fuel combusted during each day.
[40 CFR 60.48c(g)]

13. (EU 002 & 003): All records required under this section shall be maintained by the owner or operator of the affected facility for a period of two years following the date of such record.
[40 CFR 60.48c(i)]

14. (EU 002 & 003): The reporting period for the reports required under this subpart is each six-month period. All reports shall be submitted to the Administrator and shall be postmarked by the 30th day following the end of each reporting period.
[40 CFR 60.48c(j)]

15. Annual Operating Report (AOR) (All EUs): The owner or operator shall submit an Annual Operating Report for Air Pollutant Emitting Facility [DEP Form No. 62-210.900(5),] to the Department for each calendar year on or before March 1 pursuant to Rule 62-210.370(3), F.A.C.

[Rule 62-210.370(3), F.A.C.]

EXCESS EMISSIONS

16. (All EUs): Excess emissions resulting from malfunction 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 unless specifically authorized by the Department for longer duration.
[Rule 62-210.700(1), F.A.C.]

17. (All EUs): Excess emissions resulting from startup or shutdown shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized.
[Rule 62-210.700(2), F.A.C.]

18. **(All EUs):** Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown or malfunction shall be prohibited.
[Rule 62-210.700(4), F.A.C.]

ADMINISTRATIVE

19. Any revision(s) to a permit (and application) must be submitted to the Department, in writing, and approved by the Department prior to implementation.

20. A completed **Application for Air Permit –Non-Title V Source Renewal** (DEP Form No. 62-210.900(4), F.A.C.), shall be submitted to the Department at least 60 days prior to the expiration date of this permit. To properly apply for an operation permit, the permittee shall submit the appropriate application form, processing fee, and compliance test reports as required by this permit. [Rules 62-4.055 and 62-4.220, F.A.C.]

Executed in Jacksonville, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

Christopher L. Kirts, P.E.
District Air Program Administrator