

January 8, 2013

CERTIFIED MAIL:

Mr. James Carr
Vice President of Operations
VitAg Corporation
13654 2ND Avenue NE
Bradenton, FL 34212

**Subject: Project Number 0951337-002-AC
VitAg Corporation
Non-Title V Source Air Construction Permit
Project Name: Modify Construction Permit**

Dear Mr. Carr:

On October 16, 2012, you submitted an application to modify construction permit 0951337-001-AC for a fertilizer manufacturing plant. This facility will be located in Orange County at 6751 Jones Avenue in Zellwood, Florida.

Enclosed are the following documents: the Written Notice of Intent to Issue Air Permit; the Public Notice of Intent to Issue Air Permit; the Draft Permit 0951337-002-AC and Appendices; and the Technical Evaluation and Preliminary Determination. 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 John Kasper, the engineer for this project, at 407-836-1400.

Sincerely,

Jodi D. Dittell
Environmental Program Supervisor
Air Quality Management
Orange County Environmental Protection
Division

Enclosures

(2)JK/JD:bh

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

In the Matter of an Application for Air Permit by:

VitAg Corporation
6751 Jones Avenue
Zellwood, FL 32757

Air Permit Number: 0951337-002-AC
Permit Expires: December 31, 2014

Authorized Representative:
James Carr
Vice President of Operations

VitAg Corporation
Non-Title V Source Air Construction Permit
Project Name: Modify Construction Permit

Facility Location: VitAg Corporation plans to construct a new fertilizer manufacturing plant located in Orange County at 6751 Jones Avenue in Zellwood, Florida.

Project: This permit modifies combustion equipment and air pollution control equipment authorized by construction permit 0951337-001-AC. This equipment will be used in a proposed fertilizer manufacturing facility that will produce a granular, organic fertilizer using conditioned biosolids. Details of the project are provided in the application and the enclosed Technical Evaluation and Preliminary Determination.

Permitting Authority: Applications for air construction 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 construct the facility. The Permitting Authority responsible for making a permit determination for this project is the Air Quality Management section of the Orange County Environmental Protection Division (EPD). The EPD's address is 800 Mercy Drive, Suite 4, Orlando, Florida 32808. The EPD's telephone number is 407-836-1400.

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 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 EPD's project engineer for additional information at the address and phone number listed above.

Notice of Intent to Issue Permit: The EPD 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 EPD 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 EPD at the 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 EPD 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

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

62-110.106(11), F.A.C.

Comments: The EPD 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 EPD 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 EPD 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 Office of the Orange County Attorney, 201 South Rosalind Avenue, Third Floor, Orlando, Florida 32801 (Telephone 407-836-7320). 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 EPD 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 EPD'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 EPD'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 EPD 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.

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

Executed in Orange County, Orlando, Florida.

Jodi D. Dittell
Environmental Program Supervisor
Air Quality Management
Orange County Environmental Protection Division

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 certified or 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.

James Carr, Vice President of Operations, VitAg Corporation (jcarr@vitagcorp.com)
Sara Greivell, Project Manager, Grove Scientific & Engineering Co. (sara@grovescientific.com)
James Show, P.E., Grove Scientific & Engineering Co. (j_sshow@bellsouth.net)
Caroline Shine, Florida DEP (caroline.shine@dep.state.fl.us)
Tom Lubozynski, Florida DEP (tom.lubozynski@dep.state.fl.us)
Jodi Dittell, EPD (jodi.dittell@ocfl.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.

(Clerk)

(Date)

PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT

Orange County Environmental Protection Division
Air Quality Management
Draft Non-Title V Source Air Construction Permit
Project Number 0951337-002-AC
VitAg Corporation
Orange County, Florida

Applicant: The applicant for this project is VitAg Corporation. The applicant's authorized representative and mailing address are: James Carr, Vice President of Operations, VitAg Corporation, 13654 2ND Avenue NE, Bradenton, Florida, 34212.

Facility Location: VitAg Corporation plans to construct a new fertilizer manufacturing plant located in Orange County at 6751 Jones Avenue in Zellwood, Florida.

Project: This permit modifies combustion equipment and air pollution control equipment authorized by construction permit 0951337-001-AC. This equipment will be used in a proposed fertilizer manufacturing facility that will produce a granular, organic fertilizer using conditioned biosolids.

Permitting Authority: Applications for air construction 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 construct the facility. The Permitting Authority responsible for making a permit determination for this project is the Air Quality Management section of the Orange County Environmental Protection Division (EPD). The EPD's address is 800 Mercy Drive, Suite 4, Orlando, Florida 32808. The EPD's telephone number is 407-836-1400.

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 address indicated above for the EPD. 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 EPD's project engineer for additional information at the address and phone number listed above.

Notice of Intent to Issue Air Permit: The EPD 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 EPD 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 EPD 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 EPD 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 EPD 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 Office of the

(Public Notice to be Published in the Newspaper)

Orange County Attorney, 201 South Rosalind Avenue, Third Floor, Orlando, Florida 32801 (Telephone 407-836-7320). 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 EPD 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 EPD'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 EPD'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 EPD'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 EPD 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.

***** DRAFT PERMIT *****

PERMITTEE

VitAg Corporation
6751 Jones Avenue
Zellwood, FL 32757

Air Permit Number: 0951337-002-AC
Permit Expires: December 31, 2014

Authorized Representative:
James Carr
Vice President of Operations

VitAg Corporation
Non-Title V Source Air Construction Permit
Project Name: Modify Construction Permit

This final air construction permit modifies combustion equipment and air pollution control equipment authorized by construction permit 0951337-001-AC. This equipment will be used in a proposed fertilizer manufacturing facility that will produce a granular, organic fertilizer using conditioned biosolids. The proposed work will be conducted at VitAg Corporation, which will be a fertilizer manufacturing facility (Standard Industrial Classification Number 2873 for Nitrogenous Fertilizers). The facility will be located in Orange County at 6751 Jones Avenue in Zellwood, Florida. The Latitude/Longitude coordinates are: 28° 43' 58.4" N Latitude / 81° 37' 19.9" W Longitude. As noted in the Final Determination provided with this final permit, only minor changes and clarifications were made to the draft permit.

This final permit is organized by the following sections.

Section 1. General Information

Section 2. Administrative Requirements

Section 3. Emissions Unit Specific Conditions

Section 4. Appendices: Appendix A. Citation Formats and Glossary of Common Terms

Appendix B. General Conditions

Appendix C. Common Conditions

Appendix D. Common Testing Requirements

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.

This air pollution construction permit is issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to conduct the proposed work in accordance with the conditions of this permit. This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Upon issuance of this final permit, 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 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 30 days after this order is filed with the clerk of the Department.

Executed in Orange County, Florida

(DRAFT)

Jodi D. Dittell

(Date)

Environmental Program Supervisor

Air Quality Management

Orange County Environmental Protection Division

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Determination and Final Permit) was sent by certified or 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.

James Carr, Vice President of Operations, VitAg Corporation (jcarr@vitagcorp.com)

Sara Greivell, Project Manager, Grove Scientific & Engineering Co. (sara@grovescientific.com)

James Show, P.E., Grove Scientific & Engineering Co. (j_sshow@bellsouth.net)

Caroline Shine, Florida DEP (caroline.shine@dep.state.fl.us)

Tom Lubozynski, Florida DEP (tom.lubozynski@dep.state.fl.us)

Jodi Dittell, EPD (jodi.dittell@ocfl.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.

(DRAFT)

(Clerk)

(Date)

FACILITY AND PROJECT DESCRIPTION

Facility Authorized by Permit 0951337-001-AC

Permit 0951337-001-AC authorized construction of a fertilizer manufacturing facility. The manufacturing process incorporates ammonium salts with conditioned biosolids to create a granular, organic ammonium sulfate fertilizer from municipal biosolids. The facility will take in 11 tons per hour (97,000 TPY) of biosolids and produce 11 tons per hour (97,000 TPY) of fertilizer.

The primary air pollutants from this facility are criteria pollutants from combustion of natural gas. Odorous compounds from biosolids handling and processing, such as ammonia (NH₃), hydrogen sulfide (H₂S) and other reduced sulfur compounds (ORS), are an important concern. The facility processes incorporate recycling and treatment of air and vapor streams to reduce odor.

The application for permit 0951337-001-AC listed the following process and air pollution control equipment, along with chemical storage tanks, fans, quench towers, cooling towers and other process equipment not regulated by that permit.

1. Receiving building: Biosolids (average 16% solids) enter the receiving building by truck. The truck unloads biosolids into a covered, live bottom hopper leading to a receiving bin. Biosolids from the receiving bin are split into two flow streams. One stream goes into the pre-dryer and then to the pugmill, and the other goes directly to the pug mill. The receiving area is fully enclosed in the building and the building is kept under negative pressure so odors can be collected and treated. Air from the receiving area is directed through the granulator to the Pollution Control System. The receiving area includes a truck washing area enclosed in the building so that only rinsed, clean trucks leave the building.
2. Pollution Control System: The Pollution Control System consists of air pollution control equipment arranged in series and parallel, and designed to control PM, SO₂ and odor from biosolids handling and fertilizer manufacturing. The Pollution Control System consists of four bag houses, a venturi scrubber, an ammonia absorption tower, a multi-stage scrubber, a biofilter and an exhaust stack. Gases from various parts of the production process are treated by various parts of the Pollution Control System, so there are different input locations but only one emission point. For a detailed description of the Pollution Control System, see the application for permit 0951337-001-AC.
3. Indirect-fired pre-dryer: A natural gas-fired burner heats oil in a heat exchanger. The oil is used to heat one Therma-Flite screw-type biosolids dryer, to dry part of the biosolids input stream to approximately 70% to 80% solids. Vapors from the pre-dryer are condensed and sent to the ammonia absorption tower and other parts of the Pollution Control System, and the heat is dissipated with a cooling tower.
4. Process vessels: Partially dried biosolids from the pre-dryer and raw biosolids from the receiving area are mixed in a pug mill. The biosolids mixture from the pug mill is treated with sulfuric acid in a process vessel, then further treated with ammonia in a second process vessel, and then sent to the granulator. Vapors from the process vessels are treated in the Pollution Control System.
5. Granulator: The granulator shapes the fertilizer mix into a spherical pellet product. The liquid mix from the process vessels is sprayed onto a bed of fertilizer particles to form larger fertilizer granules. The granules are fed into a direct-fired rotary dryer. The air and vapors from the granulator are treated in the Pollution Control System.
6. Direct-fired rotary dryer: A natural gas-fired burner heats shaped fertilizer mix in one direct-fired rotary dryer. The fertilizer mix is dried to over 99% solids. Dryer exhaust gases are sent to bag house DC101 for PM control and the two-stage trickling biofilter before exhausting through the stack.
7. Rotary cooler and screens: Dried fertilizer passes through sizing screens and into a rotary cooler. After cooling, the fertilizer passes through another set of screens for polishing and final sizing, and is then coated with an agent to reduce dust. PM in air from the two sets of screens is removed in bag

SECTION 1. GENERAL INFORMATION (DRAFT)

house DC103, and this air is routed through the rotary cooler, where it picks up more PM. The rotary cooler air and PM are sent to bag house DC102 for PM removal. The air is then sent to the rotary dryer burner and used as part of the combustion air.

8. Warehouse: A bag house (DC104) removes PM from warehouse air and miscellaneous transfer points and vents inside the warehouse. The warehouse air is treated in the Pollution Control System.
9. Emergency generator: The facility will include an emergency generator fired with diesel fuel and rated at approximately 1000 kW. The emergency generator can meet the requirements in Rule 62-210.300(3)(a)35., F.A.C., for an exemption from air permitting.

The regulated facility equipment is grouped into two emission units (EUs) as shown below.

Facility ID Number 0951337			
EU ID	Emission Unit Description		
001	<p><u>Natural Gas-Fired Dryers</u> EU 001 consists of two dryers that burn natural gas only. Neither dryer is subject to 40 CFR Part 61 Subpart E, National Emission Standard for Mercury.</p>		
	<u>Type</u>	<u>Number</u>	<u>Rating, MMBTU/hr</u>
	Indirect-fired pre-dryer: A natural gas-fired burner heats thermal fluid in a heat exchanger. The thermal fluid is used to heat one Therma-Flite screw-type dryer, and dry part of the biosolids input stream to approximately 70 to 80% solids. Vapors from the pre-dryer are condensed and controlled with the ammonia absorption tower and other parts of the Pollution Control System. The heat exchanger burner exhausts through a stack that requires a VE compliance test.	1	14.0
	Direct-fired rotary dryer: A natural gas-fired burner heats shaped fertilizer mix in one direct-fired rotary dryer. The fertilizer mix is dried to over 99% solids. Dryer exhaust gas is sent to a bag house for PM control, then to the biofilter and exhaust stack.	1	15.5
002	<p><u>Pollution Control System</u> The EU 002 Pollution Control System consists of the following equipment. Airflows and removal efficiencies listed are nominal values only. Nomenclature in parentheses refers to the modified facility configuration of permit 0951337-002-AC.</p> <ol style="list-style-type: none"> 1. Venturi scrubber: Exhaust air from the biosolids receiving operation and granulator is controlled with a venturi scrubber. The scrubber is used to recover 90% of ammonia, with airflow of 7,000 ACFM. 2. Ammonia absorption tower (Ammonia Recovery Tower Number 1): Exhaust from the venturi scrubber is mixed with vapor from the pre-dryer and ammonia is removed with an ammonia absorption tower using sulfuric acid. Ammonia recovery is 90% and the airflow is approximately 7,000 ACFM. 3. Multi-stage sulfur compound scrubber (3-Stage Sulfur Compound Scrubber): The air is further treated and cooled with a multi-stage scrubber and using NaOH and NaOCl. Removal efficiencies are 90% for ammonia and 90% for ORS compounds, with a flow of 6,500 ACFM. 4. Scrubber-quench tower (Ammonia Recovery Tower Number 2): Air from the multi-stage scrubber is mixed with gases from the rotary dryer and cooled in a packed bed scrubber and quench tower (Scrubber Quench Tower Number 2) that also removes SO₂ from the dryer exhaust gases, at a flow of 21,500 ACFM. 5. Trickle biofilter (Enclosed Biofilter): Ventilation exhaust from the biosolids storage bins is mixed with gases from the scrubber-quench tower. Those gases are then treated in a two 		

SECTION 1. GENERAL INFORMATION (DRAFT)

	<p>stage trickling biofilter to remove 99% of hydrogen sulfide, 90% of ORS compounds and 50% of VOCs, at a flow of 21,500 ACFM.</p> <ol style="list-style-type: none">6. A 60 foot tall stack with a flow of 21,500 ACFM provides atmospheric dispersion. This stack requires a VE test.7. Four bag houses control dust and other particulate matter from various pieces of process equipment. Air from the bag houses is vented through various parts of the Pollution Control System. Airflows and removal efficiencies listed are nominal values only.<ol style="list-style-type: none">a. A 26,000 ACFM bag house, DC101, controls gases from the direct-fired rotary dryer. PM control efficiency is at least 99.9%.b. A 10,500 ACFM bag house, DC102, controls gases from the rotary cooler. PM control efficiency is at least 99.9%.c. A 9,300 ACFM bag house, DC103, controls gases from the fugitive air transfer points and miscellaneous equipment screens. PM control efficiency is at least 99.9%.d. A 4,500 ACFM bag house, DC104, collects air from all of the warehouse transfer points and miscellaneous equipment. PM control efficiency is at least 99.9%.
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The facility also contains stationary reciprocating internal combustion engine(s) (RICE) exempt from air permitting under the listed conditions. Stationary RICE that meet the criteria for a categorical exemption in Rule 62-210.300(3)(a)35., F.A.C., are classified as exempt from air permitting as long as they meet those exemption criteria. The facility must keep records to verify that the equipment meets those exemption criteria. For this facility, the exemption criteria are:

1. The engine is not subject to any unit-specific limitation or requirement other than any such limitation or requirement that may apply pursuant to 40 C.F.R. Part 60 Subpart III.
2. The engine shall not burn any fuels other than diesel fuel.
3. Collectively, all engines claiming this exemption at the same facility shall not burn more than 64,000 gallons of diesel fuel per consecutive 12 months.
4. Stationary compression ignition internal combustion engines are subject to 40 C.F.R. Part 60, Subpart III. The permittee shall comply with all limitations and requirements of Subpart III that apply to the engine.

Project description

Construction permit 0951337-001-AC was based on the best design information available at the time the permit was issued on December 27, 2011. The facility design was further refined and changes were made as described below. No changes were made to the designs of the four dust collectors. Construction of the facility has not started as of the issue date of this permit.

Design changes to the fertilizer manufacturing facility are:

1. Change the biosolids receiving operation area from an enclosed building to an area covered by a roof, enclosed by rigid walls on three sides, but open on one side for the biosolids delivery truck (this side is partially enclosed by curtains); the receiving hopper is covered and placed under a negative pressure and designed to capture odorous gases and vent them to the Pollution Control System to control odors.
2. Decrease the indirect-fired pre-dryer heat input rating from 14 MMBTU/hr to 12 MMBTU/hr.
3. Increase the direct-fired rotary dryer heat input rating from 15.5 to 21 MMBTU/hr.
4. Increase the venturi scrubber air flow from 7,000 ACFM to 8,770 ACFM.
5. Increase the Ammonia Recovery Tower Number 1 air flow from 7,000 ACFM to 9,300 SCFM, and increase the ammonia removal efficiency from 90 to 99%.
6. Add Scrubber Quench Tower Number 1.
7. Increase the 3-Stage Sulfur Compound Scrubber air flow from 6,500 to 7,200 ACFM, revise the control efficiencies to 99% for H₂S and 65% for ORS, and duct this air flow directly to the biofilter.

SECTION 1. GENERAL INFORMATION (DRAFT)

8. Reduce the air flow through Ammonia Recovery Tower Number 2 and Scrubber Quench Tower Number 2 from 21,500 to 20,300 ACFM, with ammonia removal efficiency of 99% for the ammonia recovery tower.
9. Revise the biofilter design for 21,900 ACFM airflow and 99% H₂S removal efficiency, and removal efficiencies of 50% for both VOC and ORS.
10. Add dilution flow of 19,232 ACFM to biofilter exhaust flow for reduced odor potential.
11. Increase stack height from 60 to 80 ft for reduced ground level odor potential.
12. Replace proposed exempt diesel emergency generator with an exempt natural gas-fired emergency generator; revise permit language to allow any type of exempt emergency generator.

These changes are incorporated into the new EU 001, EU 002 and exempt equipment descriptions shown in the tables below.

Facility ID Number 0951337			
EU ID	Emission Unit Description		
001	<p><u>Natural Gas-Fired Dryers</u> EU 001 consists of two dryers that burn natural gas only. Neither dryer is subject to 40 CFR Part 61 Subpart E, National Emission Standard for Mercury.</p>		
	<u>Type</u>	<u>Number</u>	<u>Rating, MMBTU/hr</u>
	<u>Indirect-Fired Pre-Dryer</u> : A natural gas-fired burner heats thermal fluid in a heat exchanger. The thermal fluid is used to heat one Therma-Flite screw-type dryer. Vapors from the pre-dryer are condensed and controlled with the Pollution Control System. The heat exchanger burner exhausts through a stack that requires a VE compliance test.	1	12
	<u>Direct-Fired Rotary Dryer</u> : A natural gas-fired burner heats shaped fertilizer mix in one direct-fired rotary dryer. The fertilizer mix is dried to over 99% solids. Dryer exhaust gas is controlled with a bag house and other parts of the Pollution Control System.	1	21
002	<p><u>Pollution Control System</u> The EU 002 Pollution Control System consists of the following equipment. There are two odor control process streams upstream of the biofilter (the granulator stream and the direct-fired rotary dryer stream) and one stream downstream of the biofilter.</p> <ol style="list-style-type: none"> 1. Equipment in the granulator stream consists of the following. <ol style="list-style-type: none"> a. <u>Venturi Scrubber</u>. Exhaust air from the biosolids receiving operation and granulator is controlled with a venturi scrubber. b. <u>Ammonia Recovery Tower Number 1</u>. Exhaust from the venturi scrubber is mixed with vapor from the pre-dryer and ammonia is removed with an ammonia recovery tower using sulfuric acid. c. <u>Scrubber Quench Tower Number 1</u>. Air from the ammonia absorption tower is cooled in a packed bed scrubber connected through a heat exchanger to a cooling tower. d. <u>3-Stage Sulfur Compound Scrubber</u>. Air from the quench tower is further treated in a 3-stage packed bed scrubber using NaOH and NaOCl, and ducted to the biofilter. 2. Equipment in the direct-fired rotary dryer stream consists of the following. <ol style="list-style-type: none"> a. <u>Ammonia Recovery Tower Number 2</u>. A second ammonia absorption tower treats gases from the rotary dryer gas stream. b. <u>Scrubber Quench Tower Number 2</u>. Gas from the ammonia absorption tower is cooled in a second packed bed quench tower and ducted to the biofilter. 3. <u>Enclosed Biofilter</u>. Treated air streams from the granulator and rotary dryer are combined 		

SECTION 1. GENERAL INFORMATION (DRAFT)

	into a single stream and treated in a covered inorganic media biofilter.
4.	<u>Exhaust Stack.</u> The treated exhaust from the biofilter is blended with dilution air and exhausted through an 80-foot tall stack for odor dispersion. The stack requires a VE test.
5.	<u>Dust Collectors.</u> Four bag houses control dust and other PM from various pieces of process equipment. Air from the bag houses is vented through various parts of the Pollution Control System. There are no changes to the dust collectors authorized in permit 0951337-001-AC.

Nominal Operating Parameters for Equipment in the Pollution Control System.

Equipment	Air Flow, ACFM	Removal Efficiency, %	Comments
Venturi Scrubber	8,770	90 (NH ₃)	Controls gases from granulator
Ammonia Recovery Tower Number 1	9,300	99 (NH ₃)	Packed bed scrubber uses sulfuric acid
Quench Tower Number 1	9,300		Reduces temperature
3-Stage Sulfur Compound Scrubber	7,200	99 (H ₂ S) 65 (ORS)	Exhausts to biofilter
Ammonia Recovery Tower Number 2	20,300	99 (NH ₃)	Controls gases from rotary dryer Packed bed scrubber uses sulfuric acid
Quench Tower Number 2	20,300		Reduces temperature, exhausts to biofilter
Enclosed Biofilter	21,900	99 (NH ₃) 50 (ORS) 50 (VOC)	Treats combined streams from the granulator and the rotary dryer.
Exhaust Stack	39,560		Flow includes added dilution air (19,323 ACFM); 80 feet tall for odor dispersion
Bag house (DC101)	26,000	99.9 (PM)	Controls gases from the rotary dryer
Bag house (DC102)	10,500	99.9 (PM)	Controls gases from the rotary cooler
Bag house (DC103)	9,300	99.9 (PM)	Controls gases from transfer points and miscellaneous equipment
Bag house (DC104)	4,500	99.9 (PM)	Controls gases from transfer points and miscellaneous equipment

Exempt Equipment

The facility also contains stationary reciprocating internal combustion engine(s) (RICE) exempt from air permitting under the listed conditions. Stationary RICE that meet the criteria for a categorical exemption in Rule 62-210.300(3)(a)35., F.A.C., are classified as exempt from air permitting as long as they meet those exemption criteria. The facility must keep records to verify that the engine(s) meets those exemption criteria. For this facility, the exemption criteria are:

1. The engine is not subject to any unit-specific limitation or requirement other than any such limitation or requirement that may apply pursuant to 40 C.F.R. Part 60, Subpart IIII or JJJJ, or 40 C.F.R Part 63, Subpart ZZZZ.
2. The engine shall not burn used oil or any fuels other than natural gas, propane, gasoline, and diesel fuel.
3. Collectively, all engines claiming this exemption at the same facility shall not burn more than the collective maximum annual amount of a single fuel, as given in subparagraph 4., or equivalent collective maximum annual amounts of multiple fuels, as addressed in subparagraph 5.

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4. If burning only one type of fuel, the collective annual amount of fuel burned by all engines claiming this exemption at the same facility shall not exceed 5,400 gallons of gasoline, 64,000 gallons of diesel fuel, 288,000 gallons of propane, or 8.8 million standard cubic feet of natural gas.
5. If burning more than one type of fuel, the equivalent collective annual amount of each fuel burned by the engines claiming this exemption at the same facility shall not exceed the collective maximum annual amount of such fuel, as given in subparagraph 4., multiplied by a fuel percentage. The fuel percentage is the percentage ratio of the total amount of the fuel burned by all engines claiming this exemption at the same facility to the total amount of such fuel allowed to be burned by all engines claiming this exemption at the same facility pursuant to subparagraph 4. The sum of the fuel percentages for all fuels burned by the engines claiming this exemption at the same facility must be less than or equal to 100 percent.
6. If the engine is a stationary compression ignition internal combustion engine that is subject to 40 C.F.R. Part 60, Subpart III, or by virtue of modification or reconstruction becomes subject to such subpart, the permittee shall comply with all limitations and requirements of Subpart III that apply to the engine.
7. If the engine is a stationary spark ignition internal combustion engine that is subject to 40 C.F.R. Part 60, Subpart JJJJ, or by virtue of modification or reconstruction becomes subject to such subpart, the permittee shall comply with all limitations and requirements of Subpart JJJJ that apply to the engine.
8. If the engine is a stationary reciprocating internal combustion engine subject to 40 C.F.R. Part 63, Subpart ZZZZ, the permittee shall comply with all limitations and requirements of Subpart ZZZZ that apply to the engine. If emissions testing is required pursuant to Subpart ZZZZ, all notifications of upcoming tests and reports shall be submitted to the EPD in accordance with the provisions of Subpart ZZZZ.

The facility remains a true minor source of air pollution.

FACILITY REGULATORY CLASSIFICATION

- The facility is a minor (non-Title V) source of NO_x.
- 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.

SECTION 2. ADMINISTRATIVE REQUIREMENTS (DRAFT)

1. Permitting & Compliance Authority: The permitting authority for this project is the Orange County Environmental Protection Division (EPD). All documents related to applications for permits to operate emission units and compliance activities such as reports, tests, and notifications shall be submitted to EPD. The mailing address and phone number of the EPD is 800 Mercy Drive, Orlando, FL 32808 and 407-836-1400.
2. 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;
 - d. Appendix D. Common Testing Requirements.
3. 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.; Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297, F.A.C.; and Orange County Ordinances Chapter 15 Article III. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.
4. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, EPD may require the permittee to conform to new or additional conditions. EPD shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, EPD may grant additional time. [Rule 62-4.080, F.A.C.]
5. Modifications: The permittee shall notify the EPD 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 EPD. 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.]
6. 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.]
7. Application for Operation Permit: This permit authorizes construction of the permitted emissions units and initial operation to determine compliance with EPD rules. An air operation permit is required for regular operation of the permitted emissions unit. The permittee shall apply for an air operation permit at least 90 days prior to expiration of this permit, but no later than 180 days after commencing operation. To apply for an air operation permit, the applicant shall submit the appropriate application form, the appropriate fee listed in Rule 62-4.050(4), compliance test results, and such additional information as EPD may by law require. [Rules 62-4.030, 62-4.050, 62-4.220 F.A.C.]

SECTION 3. EMISSION UNIT SPECIFIC CONDITIONS (DRAFT)

EU 001 and EU 002

This section of the permit addresses EU 001 and EU 002.

EU ID	Emission Unit Description		
001	<p><u>Natural Gas-Fired Dryers</u> EU 001 consists of two dryers that burn natural gas only. Neither dryer is subject to 40 CFR Part 61 Subpart E, National Emission Standard for Mercury.</p>		
	<u>Type</u>	<u>Number</u>	<u>Rating, MMBTU/hr</u>
	<p><u>Indirect-Fired Pre-Dryer</u>: A natural gas-fired burner heats thermal fluid in a heat exchanger. The thermal fluid is used to heat one Therma-Flite screw-type dryer. Vapors from the pre-dryer are condensed and controlled with the Pollution Control System. The heat exchanger burner exhausts through a stack that requires a VE compliance test.</p>	1	12
<p><u>Direct-Fired Rotary Dryer</u>: A natural gas-fired burner heats shaped fertilizer mix in one direct-fired rotary dryer. The fertilizer mix is dried to over 99% solids. Dryer exhaust gas is controlled with a bag house and other parts of the Pollution Control System.</p>	1	21	
002	<p><u>Pollution Control System</u> The EU 002 Pollution Control System consists of the following equipment. There are two odor control process streams upstream of the biofilter (the granulator stream and the direct-fired rotary dryer stream) and one stream downstream of the biofilter.</p> <ol style="list-style-type: none"> 1. Equipment in the granulator stream consists of the following. <ol style="list-style-type: none"> a. <u>Venturi Scrubber</u>. Exhaust air from the biosolids receiving operation and granulator is controlled with a venturi scrubber. b. <u>Ammonia Recovery Tower Number 1</u>. Exhaust from the venturi scrubber is mixed with vapor from the pre-dryer and ammonia is removed with an ammonia recovery tower using sulfuric acid. c. <u>Scrubber Quench Tower Number 1</u>. Air from the ammonia absorption tower is cooled in a packed bed scrubber connected through a heat exchanger to a cooling tower. d. <u>3-Stage Sulfur Compound Scrubber</u>. Air from the quench tower is further treated in a 3-stage packed bed scrubber using NaOH and NaOCl, and ducted to the biofilter. 2. Equipment in the direct-fired rotary dryer stream consists of the following. <ol style="list-style-type: none"> a. <u>Ammonia Recovery Tower Number 2</u>. A second ammonia absorption tower treats gases from the rotary dryer gas stream. b. <u>Scrubber Quench Tower Number 2</u>. Gas from the ammonia absorption tower is cooled in a second packed bed quench tower and ducted to the biofilter. 3. <u>Enclosed Biofilter</u>. Treated air streams from the granulator and rotary dryer are combined into a single stream and treated in a covered inorganic media biofilter. 4. <u>Exhaust Stack</u>. The treated exhaust from the biofilter is blended with dilution air through an 80-foot tall stack for odor dispersion. The stack requires a VE test. 5. <u>Dust Collectors</u>. Four bag houses control dust and other PM from various pieces of process equipment. Air from the bag houses is vented through various parts of the Pollution Control System. There are no changes to the dust collectors authorized in permit 0951337-001-AC. 		

SECTION 3. EMISSION UNIT SPECIFIC CONDITIONS (DRAFT)
EU 001 and EU 002

EQUIPMENT

1. **Biosolids Receiving:** The facility is authorized to construct a biosolids receiving area consisting of the following.
 - a. A biosolids receiving hopper sized to accept 150% of the maximum load from the largest biosolids delivery truck.
 - (1) The biosolids receiving hopper shall include a cover that remains closed unless receiving conditioned biosolids.
 - (2) The biosolids receiving hopper shall be designed to capture odorous gases from the biosolids receiving operations, and vent the odorous gases to the Pollution Control System for odor control.
 - (3) The biosolids receiving hopper shall be at least partially enclosed in a rigid structure with a roof and rigid walls on three sides, with curtains on the fourth side to allow easy access for the biosolids delivery truck.
 - b. A truck washing station located next to the biosolids receiving hopper. The truck washing station shall contain a drain covered by a grating; the drain shall discharge to the sanitary sewer.
 [Rule 62-4.070(3), F.A.C., Construction permit application received October 16, 2012]

2. **Dryer Equipment:** The facility is authorized to construct two natural gas-fired dryers as listed below in Table 1. The equipment is located as described in the facility and emission unit descriptions.
 [Construction permit application received October 16, 2012]

Table 1. Natural Gas-fired Dryers, Nominal Specifications.

Dryer Equipment	Manufacturer	Heat Input Rating	Air flow, SCFM
Indirect-Fired Screw-Type Biosolids Pre-Dryer	Therma-Flite	12 MMBTU/hr	N/A (Vapors condensed)
Direct-Fired Rotary Dryer	TBD	21 MMBTU/hr	20,300

3. **Pollution Control System Equipment:** The facility is authorized to construct the following Pollution Control System equipment listed below in Table 2. There is one emission point. [Construction permit application received October 16, 2012]

Table 2. Pollution Control System Nominal Equipment Specifications.

Equipment	Air Flow, ACFM	Removal Efficiency, %	Comments
Venturi Scrubber	8,770	90 (NH ₃)	Controls gases from granulator
Ammonia Recovery Tower Number 1	9,300	99 (NH ₃)	Packed bed scrubber, sulfuric acid
Quench Tower Number 1	9,300		Reduces temperature
3-Stage Sulfur Compound Scrubber	7,200	99 (H ₂ S) 65 (ORS)	Exhausts to biofilter
Ammonia Recovery Tower Number 2	20,300	99 (NH ₃)	Controls gases from rotary dryer Packed bed scrubber, sulfuric acid
Quench Tower Number 2	20,300		Reduces temperature, exhausts to biofilter
Enclosed Biofilter	21,900	99 (NH ₃) 50 (ORS) 50 (VOC)	Treats combined streams from the granulator and the rotary dryer.
Exhaust Stack	39,560		Flow includes added dilution air (19,323)

SECTION 3. EMISSION UNIT SPECIFIC CONDITIONS (DRAFT)

EU 001 and EU 002

			ACFM); 80 FT high for odor dispersion
Bag house (DC101)	26,000	99.9 (PM)	Controls gases from the rotary dryer
Bag house (DC102)	10,500	99.9 (PM)	Controls gases from the rotary cooler
Bag house (DC103)	9,300	99.9 (PM)	Controls gases from transfer points and miscellaneous equipment
Bag house (DC104)	4,500	99.9 (PM)	Controls gases from transfer points and miscellaneous equipment

OPERATING RESTRICTIONS

4. Hours of Operation. The facility is permitted to operate continuously. [Rule 62-210.200(PTE), F.A.C., Construction permit application received October 16, 2012]
5. Fuels Allowed. The Indirect-Fired Pre-Dryer and the Direct-Fired Rotary Dryer shall be fired by natural gas only. [Rule 62-210.200(PTE), F.A.C., Construction permit application received October 16, 2012]
6. Natural Gas Consumption. The natural gas fuel consumption for the dryers is limited to 281 MMCF per consecutive 12 months. [Rule 62-210.200(PTE), F.A.C., Construction permit application received October 16, 2012]
7. Biosolids Intake Rate. The maximum permitted biosolids intake rate is 97,000 tons per consecutive 12 months. [Rule 62-210.200(PTE), F.A.C., Permit 0951337-001-AC]
8. Fertilizer Production Rate. The maximum permitted fertilizer production rate is 97,000 tons per consecutive 12 months. [Rule 62-210.200(PTE), F.A.C., Permit 0951337-001-AC]
9. Biosolids Receiving. The biosolids receiving hopper shall remain covered and vented to the Pollution Control System except during unloading of the conditioned biosolids from the delivery truck. The time that the hopper cover is open shall be minimized to control odor from the biosolids receiving operation. [Construction permit application received October 16, 2012]
10. Truck Washing Operation. Biosolids delivery trucks shall be washed as required to remove biosolids from the exterior of the truck, wheels and tires before the truck leaves the biosolids receiving area. Used wash water shall be drained to the sanitary sewer. [Construction permit application received October 16, 2012]
11. Objectionable Odor Prohibited: No person shall cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An "objectionable odor" means 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 62-296.320(2) and 62-210.200(Definitions), F.A.C., Permit 0951337-001-AC]
12. Unconfined Particulate Matter. No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any activity, including vehicular movement; transportation of materials; construction, alteration, demolition or wrecking; or industrially related activities such as loading, unloading, storing or handling; without taking reasonable precautions to prevent such emissions. Reasonable precautions include 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.

SECTION 3. EMISSION UNIT SPECIFIC CONDITIONS (DRAFT)

EU 001 and EU 002

- d. Removal of particulate matter from roads and other paved areas under the control of the owner or operator of the facility to prevent re-entrainment, and from buildings or work areas to prevent particulate from becoming airborne.
 - e. Landscaping or planting of vegetation.
 - f. Use of hoods, fans, filters, and similar equipment to contain, capture and/or vent particulate matter.
 - g. Enclosure or covering of conveyor systems.
- [Rule 296.320(4)(c), F.A.C., Permit 0951337-001-AC]

EMISSIONS STANDARDS

13. Visible Emissions. Visible emissions from the Indirect-Fired Pre-Dryer heat exchanger burner stack and the Pollution Control System exhaust stack are each limited to less than 20% opacity by Rule 62-296.320(4)(b)1., F.A.C. [Permit 0951337-001-AC]

TESTING REQUIREMENTS

14. Initial Compliance Tests. The Indirect-Fired Pre-Dryer heat exchanger burner stack and the Pollution Control System exhaust stack shall be tested to demonstrate initial compliance with the emissions standards for visible emissions. The initial tests shall be conducted within 60 days after achieving permitted capacity, but not later than 180 days after initial operation of the unit. [Rules 62-4.070(3) and 62-297.310(7)(a)1, F.A.C., Permit 0951337-001-AC]
15. Initial Sulfur Emissions Determination. Emission of SO₂ and TRS from the Pollution Control System exhaust stack shall be determined within 60 days after achieving permitted capacity, but not later than 180 days after initial operation of the unit. The permittee shall determine the emissions of SO₂ and TRS in pounds per hour, and determine emission factors for these pollutants in tons of pollutant per ton of product. [Rule 62-4.070(3), F.A.C., Permit 0951337-001-AC]
16. Compliance Test Prior to Operation Permit Renewal: The Indirect-Fired Pre-Dryer heat exchanger burner stack and the Pollution Control System exhaust stack must be tested for visible emissions in accordance with EPA Method 9 at least 90 days prior to the operation permit expiration date. [Rule 62-297.310(7)(a)3, F.A.C., Permit 0951337-001-AC]
17. Test Requirements: The permittee shall notify EPD in writing at least 15 days prior to any required tests. 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.]
18. Test Methods: Required tests shall be performed in accordance with the following reference methods.

Method	Description of Method and Comments
EPA Methods 1, 2, 3, 4	Traverse Points, Velocity and Flow Rate, Gas Analysis, and Moisture Content
EPA Methods 6, 6C or Equivalent	Determination of Sulfur Dioxide Emissions from Stationary Sources
EPA Method 9	Visual Determination of the Opacity of Emissions from Stationary Sources. The minimum period of observation for the EPA Method 9 test shall be 30 minutes.
ASTM D5504 or Equivalent	Standard Test Method for Determination of Sulfur Compounds in Natural Gas and Gaseous Fuels by Gas Chromatography and Chemiluminescence

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

RECORDS AND REPORTS

19. Test Reports: 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.]
20. Recordkeeping Log. A monthly log shall be kept for this facility to document compliance with the conditions of this permit. The log shall be completed by the end of the following month and shall be kept on file at the facility for at least five years. The log shall contain the following:
- a. Month and year of operation for which records are being tabulated.
 - b. Monthly and consecutive 12-month totals of biosolids intake rates.
 - c. Monthly and consecutive 12-month totals of fertilizer production rates.
 - d. Monthly and consecutive 12-month totals of natural gas consumed by the two natural gas-fired dryers.
 - e. Monthly and consecutive 12-month totals of RICE fuel consumption.
- [Rule 62-4.070(3), F.A.C., Permit 0951337-001-AC]

Note: A consecutive 12-month 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-month total treats each month of the year as the end of a 12-month period. A 12-month total is not a year-to-date total. Facilities that have not been operating for 12 months should retain 12-month totals using whatever number of months of data are available until such a time as a consecutive 12-month total can be maintained each month. [Rule 62-297.310(8), F.A.C.]

SECTION 4. APPENDIX A (DRAFT)
Citation Formats and Glossary of Common Terms

CITATION FORMATS

The following illustrate the formats used in the permit to identify applicable requirements from permits and regulations.

Old Permit Numbers

Example: Permit No. AC50-123456 or Permit No. AO50-123456

Where: “AC” identifies the permit as an Air Construction Permit

“AO” identifies the permit as an Air Operation Permit

“123456” identifies the specific permit project number

New Permit Numbers

Example: Permit Nos. 099-2222-001-AC, 099-2222-001-AF, 099-2222-001-AO, or 099-2222-001-AV

Where: “099” represents the specific county ID number in which the project is located

“2222” represents the specific facility ID number for that county

“001” identifies the specific permit project number

“AC” identifies the permit as an air construction permit

“AF” identifies the permit as a minor source federally enforceable state operation permit

“AO” identifies the permit as a minor source air operation permit

“AV” identifies the permit as a major Title V air operation permit

PSD Permit Numbers

Example: Permit No. PSD-FL-317

Where: “PSD” means issued pursuant to the preconstruction review requirements of the Prevention of Significant Deterioration of Air Quality

“FL” means that the permit was issued by the State of Florida

“317” identifies the specific permit project number

Florida Administrative Code (F.A.C.)

Example: [Rule 62-213.205, F.A.C.]

Means: Title 62, Chapter 213, Rule 205 of the Florida Administrative Code

Code of Federal Regulations (CFR)

Example: [40 CFR 60.7]

Means: Title 40, Part 60, Section 7

GLOSSARY OF COMMON TERMS

° F: degrees Fahrenheit

AAQS: Ambient Air Quality Standard

acf: actual cubic feet

acfm: actual cubic feet per minute

ARMS: Air Resource Management System (DEP database)

BACT: best available control technology

bhp: brake horsepower

Btu: British thermal units

CAM: compliance assurance monitoring

CEMS: continuous emissions monitoring system

cfm: cubic feet per minute

SECTION 4. APPENDIX A (DRAFT)

Citation Formats and Glossary of Common Terms

CFR: Code of Federal Regulations	NESHAP: National Emissions Standards for Hazardous Air Pollutants
CAA: Clean Air Act	NH₃: ammonia
CMS: continuous monitoring system	NO_x: nitrogen oxides
CO: carbon monoxide	NSPS: New Source Performance Standards
CO₂: carbon dioxide	O&M: operation and maintenance
COMS: continuous opacity monitoring system	ORS: other reduced sulfur compounds, excluding H ₂ S
DARM: Division of Air Resource Management	O₂: oxygen
DEP: Department of Environmental Protection	Pb: lead
Department: Department of Environmental Protection	PM: particulate matter
dscf: dry standard cubic feet	PM₁₀: particulate matter with a mean aerodynamic diameter of 10 microns or less
dscfm: dry standard cubic feet per minute	ppm: parts per million
EPA: Environmental Protection Agency	ppmv: parts per million by volume
EPD: Orange County Environmental Protection Division	ppmvd: parts per million by volume, dry basis
EU: emissions unit	QA: quality assurance
F.A.C.: Florida Administrative Code	QC: quality control
F.A.W.: Florida Administrative Weekly	PSD: prevention of significant deterioration
F.D.: forced draft	psi: pounds per square inch
F.S.: Florida Statutes	PTE: potential to emit
FGD: flue gas desulfurization	RACT: reasonably available control technology
FGR: flue gas recirculation	RATA: relative accuracy test audit
ft²: square feet	RICE: reciprocating internal combustion engines
ft³: cubic feet	RBLC: EPA's RACT/BACT/LAER Clearinghouse
gpm: gallons per minute	SAM: sulfuric acid mist
gr: grains	scf: standard cubic feet
H₂S: hydrogen sulfide	scfm: standard cubic feet per minute
HAP: hazardous air pollutant	SIC: standard industrial classification code
Hg: mercury	SIP: State Implementation Plan
I.D.: induced draft	SO₂: sulfur dioxide
ID: identification	TBD: to be determined
kPa: kilopascals	TPD: tons/day
kW: kilowatt	TPH: tons per hour
lb: pound	TPY: tons per year
MACT: maximum achievable control technology	TRS: total reduced sulfur, ORS plus H ₂ S
MMBtu: million British thermal units	UTM: Universal Transverse Mercator coordinate system
MSDS: material safety data sheets	VE: visible emissions
MW: megawatt	VOC: volatile organic compounds

SECTION 4. APPENDIX B (DRAFT)

General Conditions

The permittee shall comply with the following general conditions from Rule 62-4.160, F.A.C.

1. The terms, conditions, requirements, limitations and restrictions set forth in this permit, are “permit conditions” and are binding and enforceable pursuant to Sections 403.141, 403.727, or 403.859 through 403.861, F.S. The permittee is placed on notice that EPD will review this permit periodically and may initiate enforcement action for any violation of these 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 EPD.
3. As provided in subsections 403.987(6) and 403.722(5), F.S., 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 this permit.
4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and 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 not 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 permittee to cause pollution in contravention of Florida Statutes and EPD rules, unless specifically authorized by an order from FDEP and EPD.
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 EPD 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 EPD rules.
7. The permittee, by accepting this permit, specifically agrees to allow authorized EPD personnel, upon presentation of credentials or other documents as may be required by law and at reasonable times, access to the premises where the permitted activity is located or conducted to:
 - a. Have access to and copy any records that must be kept under 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 EPD 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 EPD with the following information:
 - a. A description of and cause of noncompliance; and
 - b. The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance. The permittee shall be responsible for any and all

SECTION 4. APPENDIX B (DRAFT)

General Conditions

damages which may result and may be subject to enforcement action by EPD 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 EPD may be used by EPD as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or EPD rules, except where such use is prescribed by Sections 403.111 and 403.73, F.S. 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 EPD 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 EPD rules.
11. This permit is transferable only upon EPD approval in accordance with 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 EPD.
12. This permit or a copy thereof shall be kept at the work site of the permitted activity.
13. This permit also constitutes:
 - a. Determination of Best Available Control Technology (not applicable);
 - b. Determination of Prevention of Significant Deterioration (not applicable); and
 - c. Compliance with New Source Performance Standards (not applicable).
14. The permittee shall comply with the following:
 - a. Upon request, the permittee shall furnish all records and plans required under EPD rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by EPD.
 - 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 EPD rule.
 - c. Records of monitoring information shall include:
 - (a) The date, exact place, and time of sampling or measurements;
 - (b) The person responsible for performing the sampling or measurements;
 - (c) The dates analyses were performed;
 - (d) The person responsible for performing the analyses;
 - (e) The analytical techniques or methods used;
 - (f) The results of such analyses.
15. When requested by EPD, 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 the relevant facts were not submitted or were incorrect in the permit application or in any report to EPD, such facts or information shall be corrected promptly.
16. All air pollution sources located in Orange County are subject to the Orange County Code of Ordinances, including Chapter 15, Article III, Air Quality Control.

SECTION 4. APPENDIX C (DRAFT)

Common Conditions

Unless otherwise specified in the permit, the following conditions apply to all emissions units and activities at the facility.

EMISSIONS AND CONTROLS

1. Plant Operation - Problems: If temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by fire, wind or other cause, the permittee shall notify EPD as soon as possible, but at least within one working day, excluding weekends and holidays. The notification shall include: pertinent information as to the cause of the problem; steps being taken to correct the problem and prevent future recurrence; and, where applicable, the owner's intent toward reconstruction of destroyed facilities. Such notification does not release the permittee from any liability for failure to comply with the conditions of this permit or the regulations. [Rule 62-4.130, F.A.C.]
2. Circumvention: The permittee shall not circumvent the air pollution control equipment or allow the emission of air pollutants without this equipment operating properly. [Rule 62-210.650, F.A.C.]
3. Excess Emissions Allowed: Excess emissions resulting from startup, shutdown or malfunction of any emissions unit shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized but in no case exceed 2 hours in any 24-hour period unless specifically authorized by EPD for longer duration. Pursuant to Rule 62-210.700(5), F.A.C., the permit subsection may specify more or less stringent requirements for periods of excess emissions. Rule 62-210-700(Excess Emissions), F.A.C., cannot vary or supersede any federal NSPS or NESHAP provision. [Rule 62-210.700(1), F.A.C.]
4. Excess Emissions Prohibited: Excess emissions caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure that may reasonably be prevented during startup, shutdown or malfunction shall be prohibited. [Rule 62-210.700(4), F.A.C.]
5. Excess Emissions - Notification: In case of excess emissions resulting from malfunctions, the permittee shall notify the Compliance Authority in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by EPD. [Rule 62-210.700(6), F.A.C.]
6. VOC or OS Emissions: No person shall store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds (VOC) or organic solvents (OS) without applying known and existing vapor emission control devices or systems deemed necessary and ordered by EPD. [Rule 62-296.320(1), F.A.C.]
7. Objectionable Odor Prohibited: No person shall cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An "objectionable odor" means 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 62-296.320(2) and 62-210.200(Definitions), F.A.C.]
8. General Visible Emissions: No person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity equal to or greater than 20% opacity. This regulation does not impose a specific testing requirement. [Rule 62-296.320(4)(b)1, F.A.C.]
9. Unconfined Particulate Emissions: During the construction period, unconfined particulate matter emissions shall be minimized by dust suppressing techniques such as covering and/or application of water or chemicals to the affected areas, as necessary. [Rule 62-296.320(4)(c), F.A.C.]

RECORDS AND REPORTS

10. Records Retention: All measurements, records, and other data required by this permit shall be documented in a permanent, legible format and retained for at least 5 years following the date on which such measurements, records, or data are recorded. Records shall be made available to EPD upon request. [Rule 62-213.440(1)(b)2, F.A.C.]
11. Supporting Documentation: Supporting documentation (chemical usage tracking logs, MSDS sheets, purchase orders, EPA “As Supplied” data sheets, EPA Method 24, etc.) shall be kept for each chemical and associated products, which includes sufficient information to determine usage rates and emissions. These records shall be made available to EPD upon request. Documentation of each chemical reclaimed will use a mass balance method to determine usage and emissions (amount used minus amount collected for disposal or recycle). The log and documents shall be kept at the facility for at least five years. Daily logs shall be completed within 7 business days. [Rule 62-4.070(3), F.A.C.]
12. Emissions Computation and Reporting:
 - a. *Applicability*. This rule sets forth required methodologies to be used by the owner or operator of a facility for computing actual emissions, baseline actual emissions, and net emissions increase, as defined at Rule 62-210.200, F.A.C., and for computing emissions for purposes of the reporting requirements of subsection 62-210.370(3) and paragraph 62-212.300(1)(e), F.A.C., or of any permit condition that requires emissions be computed in accordance with this rule. This rule is not intended to establish methodologies for determining compliance with the emission limitations of any air permit. [Rule 62-210.370(1), F.A.C.]
 - b. *Computation of Emissions*. For any of the purposes set forth in subsection 62-210.370(1), F.A.C., the owner or operator of a facility shall compute emissions in accordance with the requirements set forth in this subsection.
 - (1) Basic Approach. The owner or operator shall employ, on a pollutant-specific basis, the most accurate of the approaches set forth below to compute the emissions of a pollutant from an emissions unit; provided, however, that nothing in this rule shall be construed to require installation and operation of any continuous emissions monitoring system (CEMS), continuous parameter monitoring system (CPMS), or predictive emissions monitoring system (PEMS) not otherwise required by rule or permit, nor shall anything in this rule be construed to require performance of any stack testing not otherwise required by rule or permit.
 - (a) If the emissions unit is equipped with a CEMS meeting the requirements of paragraph 62-210.370(2)(b), F.A.C., the owner or operator shall use such CEMS to compute the emissions of the pollutant, unless the owner or operator demonstrates to EPD that an alternative approach is more accurate because the CEMS represents still-emerging technology.
 - (b) If a CEMS is not available or does not meet the requirements of paragraph 62-210.370(2)(b), F.A.C, but emissions of the pollutant can be computed pursuant to the mass balance methodology of paragraph 62-210.370(2)(c), F.A.C., the owner or operator shall use such methodology, unless the owner or operator demonstrates to EPD that an alternative approach is more accurate.
 - (c) If a CEMS is not available or does not meet the requirements of paragraph 62-210.370(2)(b), F.A.C., and emissions cannot be computed pursuant to the mass balance methodology, the owner or operator shall use an emission factor meeting the

SECTION 4. APPENDIX C (DRAFT)

Common Conditions

requirements of paragraph 62-210.370(2)(d), F.A.C., unless the owner or operator demonstrates to EPD that an alternative approach is more accurate.

(2) Mass Balance Calculations.

- (a) An owner or operator may use mass balance calculations to compute emissions of a pollutant for purposes of this rule provided the owner or operator:
 - 1) Demonstrates a means of validating the content of the pollutant that is contained in or created by all materials or fuels used in or at the emissions unit; and
 - 2) Assumes that the emissions unit emits all of the pollutant that is contained in or created by any material or fuel used in or at the emissions unit if it cannot otherwise be accounted for in the process or in the capture and destruction of the pollutant by the unit's air pollution control equipment.
- (b) Where the vendor of a raw material or fuel which is used in or at the emissions unit publishes a range of pollutant content from such material or fuel, the owner or operator shall use the highest value of the range to compute the emissions, unless the owner or operator demonstrates using site-specific data that another content within the range is more accurate.
- (c) In the case of an emissions unit using coatings or solvents, the owner or operator shall document, through purchase receipts, records and sales receipts, the beginning and ending VOC inventories, the amount of VOC purchased during the computational period, and the amount of VOC disposed of in the liquid phase during such period.

(3) Emission Factors.

- a. An owner or operator may use an emission factor to compute emissions of a pollutant for purposes of this rule provided the emission factor is based on site-specific data such as stack test data, where available, unless the owner or operator demonstrates to the EPD that an alternative emission factor is more accurate. An owner or operator using site-specific data to derive an emission factor, or set of factors, shall meet the following requirements:
 - 1) If stack test data are used, the emission factor shall be based on the average emissions per unit of input, output, or gas volume, whichever is appropriate, of all valid stack tests conducted during at least a five-year period encompassing the period over which the emissions are being computed, provided all stack tests used shall represent the same operational and physical configuration of the unit.
 - 2) Multiple emission factors shall be used as necessary to account for variations in emission rate associated with variations in the emissions unit's operating rate or operating conditions during the period over which emissions are computed.
 - 3) The owner or operator shall compute emissions by multiplying the appropriate emission factor by the appropriate input, output or gas volume value for the period over which the emissions are computed. The owner or operator shall not compute emissions by converting an emission factor to pounds per hour and then multiplying by hours of operation, unless the owner or operator demonstrates that such computation is the most accurate method available.
- b. If site-specific data are not available to derive an emission factor, the owner or operator may use a published emission factor directly applicable to the process for which

SECTION 4. APPENDIX C (DRAFT)

Common Conditions

emissions are computed. If no directly-applicable emission factor is available, the owner or operator may use a factor based on a similar, but different, process.

- (4) Accounting for Emissions During Periods of Missing Data from CEMS, PEMS, or CPMS. In computing the emissions of a pollutant, the owner or operator shall account for the emissions during periods of missing data from CEMS, PEMS, or CPMS using other site-specific data to generate a reasonable estimate of such emissions.
- (5) Accounting for Emissions During Periods of Startup and Shutdown. In computing the emissions of a pollutant, the owner or operator shall account for the emissions during periods of startup and shutdown of the emissions unit.
- (6) Fugitive Emissions. In computing the emissions of a pollutant from a facility or emissions unit, the owner or operator shall account for the fugitive emissions of the pollutant, to the extent quantifiable, associated with such facility or emissions unit.
- (7) Recordkeeping. The owner or operator shall retain a copy of all records used to compute emissions pursuant to this rule for a period of five years from the date on which such emissions information is submitted to the EPD for any regulatory purpose.

[Rule 62-210.370(2), F.A.C.]

c. *Annual Operating Report for Air Pollutant Emitting Facility*

- (1) The Annual Operating Report for Air Pollutant Emitting Facility (DEP Form No. 62-210.900(5)) shall be completed each year for the following facilities:
 - a. All synthetic non-Title V sources.
 - b. All facilities with the potential to emit ten (10) tons per year or more of volatile organic compounds or twenty-five (25) tons per year or more of nitrogen oxides and located in an ozone nonattainment area or ozone air quality maintenance area.
- (2) The annual operating report shall be submitted to EPD by April 1 of the following year. If the report is submitted using the FDEP electronic annual operating report software, there is no requirement to submit a copy to EPD.
- (3) Emissions shall be computed in accordance with the provisions of subsection 62-210.370(2), F.A.C., for purposes of the annual operating report.

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

- d. *Facility Relocation.* Unless otherwise provided by rule or more stringent permit condition, the owner or operator of a relocatable facility must submit a Facility Relocation Notification Form (DEP Form No. 62-210.900(6)) to EPD at least 30 days prior to the relocation. A separate form shall be submitted for each facility in the case of the relocation of multiple facilities which are jointly owned or operated.

[Rule 62-210.370(4), F.A.C.]

SECTION 4. APPENDIX D (DRAFT)

Common Testing Requirements

Unless otherwise specified in the permit, the following testing requirements apply to all emissions units at the facility.

COMPLIANCE TESTING REQUIREMENTS

1. Operating Rate During Testing: Testing of emissions shall be conducted with the emissions unit operating at permitted capacity. If it is impractical to test at permitted capacity, an emissions unit may be tested at less than the maximum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test rate 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), F.A.C.]
2. Applicable Test Procedures - Opacity Compliance Tests: When either EPA Method 9 or DEP Method 9 is specified as the applicable opacity test method, the required minimum period of observation for a compliance test shall be sixty (60) minutes for emissions units which emit or have the potential to emit 100 tons per year or more of particulate matter, and thirty (30) minutes for emissions units which have potential emissions less than 100 tons per year of particulate matter and are not subject to a multiple-valued opacity standard. The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur. Exceptions to these requirements are as follows:
 - a. For batch, cyclical processes, or other operations which are normally completed within less than the minimum observation period and do not recur within that time, the period of observation shall be equal to the duration of the batch cycle or operation completion time.
 - b. The observation period for special opacity tests that are conducted to provide data to establish a surrogate standard pursuant to Rule 62-297.310(5)(k), F.A.C., Waiver of Compliance Test Requirements, shall be established as necessary to properly establish the relationship between a proposed surrogate standard and an existing mass emission limiting standard.
 - c. The minimum observation period for opacity tests conducted by employees or agents of EPD to verify the day-to-day continuing compliance of a unit or activity with an applicable opacity standard shall be twelve minutes.
[Rule 62-297.310(4), F.A.C.]
3. Determination of Process Variables:
 - a. *Required Equipment*. The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.
 - b. *Accuracy of Equipment*. Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.
[Rule 62-297.310(5), F.A.C.]
4. Frequency of Compliance Tests: The following provisions apply only to those emissions units that are subject to an emissions limiting standard for which compliance testing is required.
 - a. *General Compliance Testing*.
 1. The owner or operator of a new or modified emissions unit that is subject to an emission

SECTION 4. APPENDIX D (DRAFT)

Common Testing Requirements

- limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining an operation permit for such emissions unit.
2. The owner or operator of an emissions unit that is subject to any emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining a renewed operation permit.
 3. The owner or operator shall notify EPD, 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 or operator.
- b. *Special Compliance Tests.* When EPD, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in an FDEP rule or in a permit issued pursuant to those rules is being violated, it shall require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to EPD.

[Rule 62-297.310(7), F.A.C.]

RECORDS AND REPORTS

5. Test Reports: The owner or operator of an emissions unit for which a compliance test is required shall file a report with EPD on the results of each such test. The required test report shall be filed with EPD as soon as practical but no later than 45 days after the last sampling run of each test is completed. The test report shall provide sufficient detail on the emissions unit tested and the test procedures used to allow EPD to determine if the test was properly conducted and the test results properly computed. As a minimum, the test report shall provide the following information.
 - a. The type, location, and designation of the emissions unit tested.
 - b. The facility at which the emissions unit is located.
 - c. The owner or operator of the emissions unit.
 - d. The normal type and amount of fuels used and materials processed, and the types and amounts of fuels used and material processed during each test run.
 - e. The means, raw data and computations used to determine the amount of fuels used and materials processed, if necessary to determine compliance with an applicable emission limiting standard.
 - f. The date, starting time and end time of the observation.
 - g. The test procedures used.
 - h. The names of individuals who furnished the process variable data, conducted the test, and prepared the report.
 - i. The applicable emission standard and the resulting maximum allowable emission rate for the emissions unit plus the test result in the same form and unit of measure.
 - j. A certification that, to the knowledge of the owner or his authorized agent, all data submitted are true and correct. The owner or his authorized agent shall certify that all data required and provided to the person conducting the test are true and correct to his knowledge.

[Rule 62-297.310(8), F.A.C.]

**TECHNICAL EVALUATION
AND
PRELIMINARY DETERMINATION**

APPLICANT

VitAg Corporation
6751 Jones Avenue,
Zellwood, FL 32757

Facility ID Number 0951337

PROJECT

Application for Non-Title V Source Air Construction Permit
Project Number: 0951337-002
Project Name: Modify Construction Permit

PERMITTING AUTHORITY

Orange County Environmental Protection Division
Air Quality Management
800 Mercy Drive
Suite 4
Orlando, Florida 32808

January 8, 2013

1. GENERAL PROJECT INFORMATION

Air Pollution Regulations

Projects at stationary sources with the potential to emit air pollution are subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The statutes authorize the Department of Environmental Protection (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); 62-296 (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.

In accordance with the terms of its Specific Operating Agreement, the Orange County Environmental Protection Division (EPD) has been delegated the authority to process this application on behalf of the Department.

Glossary of Common Terms

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

Facility Description and Location

VitAg Corporation plans to construct a fertilizer manufacturing facility under Standard Industrial Classification Number 2873 for Nitrogenous Fertilizers. The facility is located in Orange County at 6751 Jones Avenue in Zellwood, Florida. The latitude and longitude of the site are 28° 43' 58.4" N / 81° 37' 19.9" W, respectively. This site is in an area that is in attainment (Orange County is an attainment maintenance area) for all air pollutants subject to state and federal Ambient Air Quality Standards (AAQS).

Facility Regulatory Categories

- The facility is a non-Title V source of NO_x.
- The facility is not a major source of HAP.
- The facility has no emission units subject to the acid rain provisions of the Clean Air Act.
- The facility is not a Title V major source of air pollution in accordance with Chapter 213, F.A.C.
- The facility is not a major stationary source in accordance with Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Project Description

Construction permit 0951337-001-AC was based on the best design information available at the time the permit was issued on December 27, 2011. The facility design was further refined and changes were made as described below. No changes were made to the designs of the four dust collectors. Construction of the facility has not started as of the issue date of this permit.

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

Design changes to the fertilizer manufacturing facility are:

1. Change the biosolids receiving operation area from an enclosed building to an area covered by a roof, enclosed by rigid walls on three sides, but open on one side for the biosolids delivery truck (this side is partially enclosed by curtains); the receiving hopper is covered and placed under a negative pressure and designed to capture odorous gases and vent them to the Pollution Control System to control odors.
2. Decrease the indirect-fired pre-dryer heat input rating from 14 MMBTU/hr to 12 MMBTU/hr.
3. Increase the direct-fired rotary dryer heat input rating from 15.5 to 21 MMBTU/hr.
4. Increase the venturi scrubber air flow from 7,000 ACFM to 8,770 ACFM.
5. Increase the Ammonia Recovery Tower Number 1 air flow from 7,000 ACFM to 9,300 SCFM, and increase the ammonia removal efficiency from 90 to 99%.
6. Add Scrubber Quench Tower Number 1.
7. Increase the 3-Stage Sulfur Compound Scrubber air flow from 6,500 to 7,200 ACFM, revise the control efficiencies to 99% for H₂S and 65% for ORS, and duct this air flow directly to the biofilter.
8. Reduce the air flow through Ammonia Recovery Tower Number 2 and Scrubber Quench Tower Number 2 from 21,500 to 20,300 ACFM, with ammonia removal efficiency of 99% for the ammonia recovery tower.
9. Revise the biofilter design for 21,900 ACFM airflow and 99% H₂S removal efficiency, and removal efficiencies of 50% for both VOC and ORS.
10. Add dilution flow of 19,232 ACFM to biofilter exhaust flow for reduced odor potential.
11. Increase stack height from 60 to 80 ft for reduced ground level odor potential.
12. Replace proposed exempt diesel emergency generator with an exempt natural gas-fired emergency generator; revise permit language to allow any type of exempt emergency generator.

These changes are incorporated into the new EU 001, EU 002 and exempt equipment descriptions shown in the tables below.

Facility ID Number 0951337			
EU ID	Emission Unit Description		
001	<u>Natural Gas-Fired Dryers</u> EU 001 consists of two dryers that burn natural gas only. Neither dryer is subject to 40 CFR Part 61 Subpart E, National Emission Standard for Mercury.		
	<u>Type</u>	<u>Number</u>	<u>Rating, MMBTU/hr</u>
	<u>Indirect-Fired Pre-Dryer:</u> A natural gas-fired burner heats thermal fluid in a heat exchanger. The thermal fluid is used to heat one Therma-Flite screw-type dryer. Vapors from the pre-dryer are condensed and controlled with the Pollution Control System. The heat exchanger burner exhausts through a stack that requires a VE compliance test.	1	12
	<u>Direct-Fired Rotary Dryer:</u> A natural gas-fired burner heats shaped fertilizer mix in one direct-fired rotary dryer. The fertilizer mix is dried to over 99% solids. Dryer exhaust gas is controlled with a bag house and other parts of the Pollution Control System.	1	21
002	<u>Pollution Control System</u> The EU 002 Pollution Control System consists of the following equipment. There are two odor control process streams upstream of the biofilter (the granulator stream and the direct-fired rotary dryer stream) and one stream downstream of the biofilter.		
	1. Equipment in the granulator stream consists of the following.		

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

	<p>a. <u>Venturi Scrubber</u>. Exhaust air from the biosolids receiving operation and granulator is controlled with a venturi scrubber.</p> <p>b. <u>Ammonia Recovery Tower Number 1</u>. Exhaust from the venturi scrubber is mixed with vapor from the pre-dryer and ammonia is removed with an ammonia recovery tower using sulfuric acid.</p> <p>c. <u>Scrubber Quench Tower Number 1</u>. Air from the ammonia absorption tower is cooled in a packed bed scrubber connected through a heat exchanger to a cooling tower.</p> <p>d. <u>3-Stage Sulfur Compound Scrubber</u>. Air from the quench tower is further treated in a 3-stage packed bed scrubber using NaOH and NaOCl, and ducted to the biofilter.</p> <p>2. Equipment in the direct-fired rotary dryer stream consists of the following.</p> <p>a. <u>Ammonia Recovery Tower Number 2</u>. A second ammonia absorption tower treats gases from the rotary dryer gas stream.</p> <p>b. <u>Scrubber Quench Tower Number 2</u>. Gas from the ammonia absorption tower is cooled in a second packed bed quench tower and ducted to the biofilter.</p> <p>3. <u>Enclosed Biofilter</u>. Treated air streams from the granulator and rotary dryer are combined into a single stream and treated in a covered inorganic media biofilter.</p> <p>4. <u>Exhaust Stack</u>. The treated exhaust from the biofilter is blended with dilution air and exhausted through an 80-foot tall stack for odor dispersion. The stack requires a VE test.</p> <p>5. <u>Dust Collectors</u>. Four bag houses control dust and other PM from various pieces of process equipment. Air from the bag houses is vented through various parts of the Pollution Control System. There are no changes to the dust collectors authorized in permit 0951337-001-AC.</p>
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Nominal Operating Parameters for Equipment in the Pollution Control System.

Equipment	Air Flow, ACFM	Removal Efficiency, %	Comments
Venturi Scrubber	8,770	90 (NH ₃)	Controls gases from granulator
Ammonia Recovery Tower Number 1	9,300	99 (NH ₃)	Packed bed scrubber uses sulfuric acid
Quench Tower Number 1	9,300		Reduces temperature
3-Stage Sulfur Compound Scrubber	7,200	99 (H ₂ S) 65 (ORS)	Exhausts to biofilter
Ammonia Recovery Tower Number 2	20,300	99 (NH ₃)	Controls gases from rotary dryer Packed bed scrubber uses sulfuric acid
Quench Tower Number 2	20,300		Reduces temperature, exhausts to biofilter
Enclosed Biofilter	21,900	99 (NH ₃) 50 (ORS) 50 (VOC)	Treats combined streams from the granulator and the rotary dryer.
Exhaust Stack	39,560		Flow includes added dilution air (19,323 ACFM); 80 feet tall for odor dispersion
Bag house (DC101)	26,000	99.9 (PM)	Controls gases from the rotary dryer
Bag house (DC102)	10,500	99.9 (PM)	Controls gases from the rotary cooler
Bag house (DC103)	9,300	99.9 (PM)	Controls gases from transfer points and miscellaneous equipment

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Bag house (DC104)	4,500	99.9 (PM)	Controls gases from transfer points and miscellaneous equipment
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Exempt Equipment

The facility also contains stationary reciprocating internal combustion engine(s) (RICE) exempt from air permitting under the listed conditions. Stationary RICE that meet the criteria for a categorical exemption in Rule 62-210.300(3)(a)35., F.A.C., are classified as exempt from air permitting as long as they meet those exemption criteria. The facility must keep records to verify that the engine(s) meets those exemption criteria. For this facility, the exemption criteria are:

1. The engine is not subject to any unit-specific limitation or requirement other than any such limitation or requirement that may apply pursuant to 40 C.F.R. Part 60, Subpart IIII or JJJJ, or 40 C.F.R Part 63, Subpart ZZZZ.
2. The engine shall not burn used oil or any fuels other than natural gas, propane, gasoline, and diesel fuel.
3. Collectively, all engines claiming this exemption at the same facility shall not burn more than the collective maximum annual amount of a single fuel, as given in subparagraph 4., or equivalent collective maximum annual amounts of multiple fuels, as addressed in subparagraph 5.
4. If burning only one type of fuel, the collective annual amount of fuel burned by all engines claiming this exemption at the same facility shall not exceed 5,400 gallons of gasoline, 64,000 gallons of diesel fuel, 288,000 gallons of propane, or 8.8 million standard cubic feet of natural gas.
5. If burning more than one type of fuel, the equivalent collective annual amount of each fuel burned by the engines claiming this exemption at the same facility shall not exceed the collective maximum annual amount of such fuel, as given in subparagraph 4., multiplied by a fuel percentage. The fuel percentage is the percentage ratio of the total amount of the fuel burned by all engines claiming this exemption at the same facility to the total amount of such fuel allowed to be burned by all engines claiming this exemption at the same facility pursuant to subparagraph 4. The sum of the fuel percentages for all fuels burned by the engines claiming this exemption at the same facility must be less than or equal to 100 percent.
6. If the engine is a stationary compression ignition internal combustion engine that is subject to 40 C.F.R. Part 60, Subpart IIII, or by virtue of modification or reconstruction becomes subject to such subpart, the permittee shall comply with all limitations and requirements of Subpart IIII that apply to the engine.
7. If the engine is a stationary spark ignition internal combustion engine that is subject to 40 C.F.R. Part 60, Subpart JJJJ, or by virtue of modification or reconstruction becomes subject to such subpart, the permittee shall comply with all limitations and requirements of Subpart JJJJ that apply to the engine.
8. If the engine is a stationary reciprocating internal combustion engine subject to 40 C.F.R. Part 63, Subpart ZZZZ, the permittee shall comply with all limitations and requirements of Subpart ZZZZ that apply to the engine. If emissions testing is required pursuant to Subpart ZZZZ, all notifications of upcoming tests and reports shall be submitted to the EPD in accordance with the provisions of Subpart ZZZZ.

The facility remains a true minor source of air pollution.

Processing Schedule

10/16/12	Received the application and processing fee for a minor source air construction permit, starting the permit clock.
11/08/12	Application review results: application incomplete.
11/08/12	Request additional information.
11/29/12	Receive additional information.

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representative.

3. The analysis predicted odor concentrations at the site boundaries that were barely detectable.
4. The analysis also predicted odor concentrations that would cause complaints but those higher concentrations were in a relatively small area in the center of the site near the biosolids unloading hopper, not near the site boundaries.

The EPD accepted this second odor emission analysis as providing reasonable assurance that odors from the biosolids receiving operation would be sufficiently controlled to meet the rule requirements.

Two members of EPD's staff visited the applicant's bench-scale, process development facility in Lakeland, Florida on December 17, 2012. They reported no apparent factors that would contradict the results of the CDM Smith odor emission analysis for the biosolids receiving area.

The EPD thus accepts the applicant's odor emission analyses results as providing reasonable assurance that odors from the VitAg facility will meet the requirements for no objectionable odors in Rules 62-296.320(2) and 62-210.200(221), F.A.C.

The changes in the heat input ratings for the two dryers causes potential criteria pollutant emissions to increase somewhat, but the total potential to emit (PTE) is well below the Title V thresholds for those pollutants. Potential natural gas consumption increases to 281 MMCF/yr, which is a permit limit. Criteria pollutant potential emissions from dryer combustion are shown below, using the potential natural gas consumption and emission factors from AP-42 section 1.4.

Table TE-1. Criteria Pollutant Potential Emissions from the Two Dryer Burners

Pollutant	Dryer PTE, TPY
NO _x	14.1
CO	11.8
SO ₂	0.1
VOC	0.8
PM	1.1

The application calculates emissions from an exempt emergency generator allowed by Rule 62-210.300(3)(a)35., F.A.C. The facility proposes to install a spark ignition emergency generator rated at 100 kW, and fired with natural gas. New emergency generators are subject to NSPSs for RICE, specifically 40 CFR Part 60 Subpart JJJJ for spark ignition engines and 40 CFR Part 60 Subpart IIII for compression ignition engines. Permit 0951337-001-AC authorized a diesel emergency generator, and the application for this project requested the diesel generator engine be replaced with a natural gas-fired spark ignition engine. This permit is written to accommodate both types of engines to allow for any type of engine in the future as the facility is likely expanded. The calculations below are for the spark ignition engine listed in the application. Criteria pollutant emissions for the engine were calculated based on operation for 500 hours/yr, using emission factors from AP-42 section 3.2. These potential emissions are shown in the table below.

Table TE-2. Potential Emissions from Emergency Generator

Pollutant	Emergency Generator PTE, TPY
NO _x	1.1
CO	0.1
SO ₂	0.0
VOC	0.0
PM	0.0

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The application gave calculated emissions of the odorous gases ammonia, H₂S, ORS and VOC from the Pollution Control System. VOC is the only regulated pollutant. The other pollutants cause odor, EPD's primary concern for this facility. The EPD notes, however, that the Pollution Control System includes an 80-foot tall stack for atmospheric dispersion of odorous compounds. Dispersion would lower the ground level concentration of pollutants from the stack, but not the emission rate. Odorous compound emission estimates from the application are shown in the table below.

Table TE-3. Potential Emissions of Odorous Compounds from Production Processes

Pollutant	Production Process Emissions PTE, TPY
NH ₃	0.5
H ₂ S	0.0
ORS	0.1
VOC	0.5

There are four bag houses, all vented through the Pollution Control System. There are no changes to the bag house parameters. Potential emissions from the facility equipment are summarized below, including exempt equipment, to show that the facility is a true non-Title V source with all potential emissions below Title V thresholds. Note that SO₂ may be emitted as odorous process gases containing sulfur gases are burned in the direct-fired dryer. At present, actual emissions of SO₂ from the facility are unknown but are estimated by the applicant to be small compared to the Title V threshold of 100 TPY. The permittee will measure SO₂ in the exhaust stack during the initial compliance test to verify these estimates.

Table TE-4. Potential Emissions from All Sources at the Facility

Pollutant	Dryer PTE, TPY	Engines	Odor Control System	Total TPY	Title V Threshold, TPY
NO _x	14.1	1.1	0	15.2	100
CO	11.8	0.1	0	11.9	100
SO ₂	0.1	0.0	Estimated <<100 TPY	Estimated <<100 TPY	100
VOC	0.8	0.0	0.5	1.3	100
PM	1.1	0.0	0	1.1	100
HAPS	0	0	0	0	10
H ₂ S	0	0	0.0	0	Not Applicable
NH ₃	0	0	0.5	0.5	Not Applicable
ORS	0	0	0.1	0.1	Not Applicable

Emissions from non-exempt equipment are shown in the table below and compared with Title V thresholds. These emissions include those from dryer burner combustion and the Pollution Control System. With potential NO_x emissions less than 25 TPY and potential VOC emissions less than 10 TPY, no Annual Operating Report is required.

Table TE-5. Potential Emissions of Non-Exempt Sources Compared to Title V Thresholds

Pollutant	Dryer PTE, TPY	Odor Control System	Total TPY	Title V Threshold, TPY
NO _x	14.1	0	14.1	100
CO	11.8	0	11.8	100
SO ₂	0.1	Estimated <<100 TPY	Estimated <<100 TPY	100

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VOC	0.8	0.5	1.3	100
PM	1.1	0	1.1	100
HAPS	0	0	0	10

State Requirements

- 62-4.070(3) Permit standards
- 62-210.200 Definitions
- 62-210.300(3) Exemptions
- 62-210.370 Emissions computation and reporting
- 62-296.320(2) Objectionable odor prohibition
- 62-296.320(4) Particulate emissions standard
- 62-296.320(4)(b) General visible emission standard
- 62-297.100 Purpose and scope
- 62-297.310 Compliance test requirements
- 62-297.320 Visible emissions test requirements
- 62-297.401 Compliance test methods

Federal NSPS Provisions

None for regulated equipment

Federal NESHAP Provisions

None for regulated equipment

Other Draft Permit Requirements

Orange County Ordinance Chapter 15 Article III

4. PRELIMINARY DETERMINATION

The EPD 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. John Kasper is the project engineer responsible for reviewing the application and drafting the permit. Additional details of this analysis may be obtained by contacting the project engineer at the Orange County Environmental Protection Division, 800 Mercy Drive, Suite 4, Orlando, Florida 32808, 407-836-1400.