



Florida Department of Environmental Protection

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

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr.
Secretary

Electronically Sent- Received Receipt Requested

FINAL PERMIT

PERMITTEE

Cargill, Inc.
1845 Avenue A
Kissimmee, Florida

Air Permit No. 0970034-008-AO
Permit Expires: 08/30/2017
Site Name: Cargill Animal Nutrition
Minor Source Air Operation
Project Name: Permit Renewal

Authorized Representative:
Mr. Roger Atkins, Assistant Production Manager

This is the final air operation permit, which authorizes operation of an animal feed production facility. The production is conducted at the Cargill Animal Nutrition (Standard Industrial Classification No. 2048). The facility is located in Osceola County at 1845 Avenue A in Kissimmee, Florida. The UTM coordinates are Zone 17, 451.6 km East, and 3124 km North.

This final permit is organized by the following sections:

- Section 1. General Information
- Section 2. Administrative Requirements
- Section 3. Facility-wide and Emissions Unit Specific Conditions
- Section 4. Appendices

Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 of this permit.

This air pollution 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.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of final permit. Petitions filed by any persons other than those entitled to written notice under section 120.60(3) of the Florida Statutes must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of final permit, whichever occurs first. Under section 120.60(3), however, any person who asked the Department for notice

of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under sections 120.569 and 120.57 F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with rule 28-106.205 of the Florida Administrative Code.

All petitions filed under these rules shall contain:

- (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 the petitioner received notice of the agency decision;
- (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate;
- (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the 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 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 Department'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 of the Florida Administrative Code.

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

Mediation is not available in this proceeding.

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, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000, and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the

appropriate district court of appeal. The notice must be filed within thirty days after this order is filed with the clerk of the Department.

Executed in Orange County, Florida



September 5, 2012

Caroline D. Shine

Effective Date

District Air Program Administrator

Central District

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Determination, the Final Permit and the Appendices) was sent by electronic mail (or a link to these documents made available electronically on a publicly accessible server) with received receipt requested before the close of business on September 5, 2012 to the persons listed below:

Mr. Roger Atkins, Assistant Production Manager, Cargill, Inc. (roger_atkins@cargill.com)

Roger T. Caldwell, V.P. Bottorf Associates, Inc. (roger@bottorf.com)

Clerk Stamp

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



September 5, 2012

(Clerk)

(Date)

SECTION 1. GENERAL INFORMATION (FINAL)

FACILITY AND PROJECT DESCRIPTION

The existing facility consists of the following emissions units.

Facility ID No. 0970034	
ID No.	Emission Unit Description
001	Rail and truck receiving doors
002	Kice grain cleaner and Law Marot grain cleaner
003	Boiler
004	Hand-add process dust collector
005	Bagging process dust collector
006	Bulk loading doors
007	Pellet cooler
008	Pellet mill/pellet cooler #2

FACILITY REGULATORY CLASSIFICATION

- The facility is not a major source of hazardous air pollutants (HAP).
- The facility has no units subject to the acid rain provisions of the Clean Air Act (CAA).
- The facility is not a Title V major source of air pollution in accordance with Chapter 213, F.A.C.
- The facility is not a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.
- This facility is a natural minor source for particulates.

PERMIT HISTORY/AFFECTED PERMITS

Replaces Permit No. 0970034-007-AO.

SECTION 2. ADMINISTRATIVE REQUIREMENTS (FINAL)

1. Permitting Authority: The permitting authority for this project is the Florida Department of Environmental Protection, Central District Air Resource Management Section. The Central District's mailing address and phone number are:

Florida Department of Environmental Protection
Central District Office
Air Resource Management Section
3319 Maguire Blvd., Ste. 232
Orlando, FL 32803-3767 Telephone: 407-897-4100

All documents related to applications for permits shall be submitted to the above address.

2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Central District Air Resource Management Section (see above mailing address and phone number).
3. Appendices: The following Appendices are attached as part of this permit:
 - a. Appendix A. Citation Formats and Glossary of Common Terms;
 - b. Appendix B. General Conditions;
 - c. Appendix C. Common Conditions; and
 - d. Appendix D. Common Testing Requirements.
4. Applicable Regulations, Forms and Application Procedures: Unless otherwise specified in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.
5. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time.
[Rule 62-4.080, F.A.C.]
6. Modifications: Unless otherwise exempt by rule, the permittee shall not initiate any construction, reconstruction, or modification at the facility and shall not install/modify any pollution control device at the facility without obtaining prior authorization from the Department. Modification is defined as: Any physical change or changes in the method of operations or addition to a facility that would result in an increase in the actual emissions of any air pollutant subject to air regulations, including any not previously emitted, from any emission unit or facility.
[Rules 62-210.200 - Definition of "Modification" and 62-210.300(1)(a), F.A.C.]
7. Operation Permit Renewal Application: A completed application for renewal of the operation permit shall be submitted to the Permitting Authority no later than 60 days prior to the expiration date of the operation permit. To properly apply for an operation permit, the applicant shall submit the following:

SECTION 2. ADMINISTRATIVE REQUIREMENTS (FINAL)

- a. the appropriate permit application form (*see current version of Rule 62-210.900, F.A.C. (Forms and Instructions), and/or FDEP Division of Air Resource Management website at: <http://www.dep.state.fl.us/air/>*);
- b. the appropriate operation permit application fee from Rule 62-4.050(4)(a), F.A.C.;
- c. copies of the most recent compliance test reports required by Specific Condition No(s). **A.8.** and **A.13.**, if not previously submitted; and
- d. copies of the most recent two months of records/logs specified in Specific Condition No. **A.14.**

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

SECTION 3. FACILITY-WIDE AND EMISSIONS UNIT SPECIFIC CONDITIONS (FINAL)

A. EU No(s) 001, 002, 003, 004, 005, 006, 007, and 008 Grain Handling System

This section of the permit addresses the following emissions units.

ID No.	Emission Unit Description
001	Rail and truck receiving pit doors
002	Kice aspirator cleaner and flaking cooler (Mac Model LD-7 Cyclone) and Law Marot grain cleaner (Mac model FPC-30 Cyclone followed by a fabric air filter).
003	8.315 MMBTU/Hr steam boiler fired by natural gas (No.2 fuel oil is used as an emergency backup)
004	Hand-add process including a Donaldson model IG2208921 cyclone followed by a fabric after filter.
005	Bagging process including a Donaldson model IG2208921 cyclone followed by a fabric after filter.
006	Bulk loading doors
007	Pellet mill/Pellet cooler No. 1, including a Mac model MD-90 cyclone
008	Pellet mill/Pellet cooler No. 2, including a Mac model 2IIE36 cyclone

PERFORMANCE RESTRICTIONS

- A.1. Permitted Capacity: The maximum permitted process rate for the grain handling system is 448,000 tons of product per consecutive twelve-month period, updated monthly. [Permit Application dated 07/30/2012 and Rule 62-210.200(PTE), F.A.C.]
- A.2. Authorized Fuel: Emission Unit No. 003 shall be fired with natural gas only, except during natural gas supply curtailment. In the event of natural gas supply curtailment, No. 2 fuel oil with a maximum sulfur content of 0.5 percent shall be used as an emergency backup. [Permit Application dated 07/30/2012 and Rule 62-210.200(PTE), F.A.C.]
- A.3. Restricted Operation: The hours of operation are not limited (8,760 hours per year). [Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]
- A.4. Unconfined Particulate Emissions: All reasonable precautions shall be taken to prevent emissions of unconfined particulate matter. Reasonable precautions shall include, but not be limited to, the following:
- Application of water when necessary to control emissions.
 - Removal of particulate matter from roads and other paved areas under control of the owner or operator to prevent reentrainment, and from buildings or work areas to prevent particulate.
 - Enclosure or covering of conveyor systems.
 - Limit the material drop height wherever possible
 - Landscaping or planting of vegetation
- [Permit Application dated 07/30/2012 and Rule 62-296.320(4)(c), F.A.C.]:

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EMISSIONS STANDARDS

- A.5. General Visible Emissions (VE) Limitation: Visible emissions for each source that emits particulates shall not exceed 5 percent opacity.
[Rules 62-4.070(3), F.A.C.]
- A.6. Emission Limitations: The combined maximum particulate emissions from Emission Units 002, 003, 004, 005, 007 and 008 are limited to less than 49.5 tons per year. The permittee has agreed to demonstrate compliance with this limitation by maintaining a 5% visible emission limitation and operating and maintaining their cyclone and fabric filters in accordance with Condition **A.16**. [Rule 62-4.070(3), F.A.C.]
- A.7. Sulfur Dioxide Emission Limitation: The sulfur dioxide emissions from the boiler shall be limited to 2 tons per consecutive twelve-month period, updated monthly.
[Rule 62-296.200 (PTE), F.A.C.]

TESTING REQUIREMENTS

- A.8. Compliance Tests: At least 90 days prior to permit expiration date, each emission unit shall be tested to demonstrate compliance with the emissions standard for visible emissions.
[Rule 62-297.310, F.A.C.]
- A.9. Test Requirements: Tests shall be conducted in accordance with the applicable requirements specified in Appendix D (Common Testing Requirements) of this permit.
[Rule 62-297.310, F.A.C.]
- A.10. Test Method(s): Required tests shall be performed in accordance with the following reference method(s).

Method(s)	Description of Method and Comments
9	Visual Determination of the Opacity of Emissions from Stationary Sources

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

[Rules 62-204.800 and 62-297.100, F.A.C.; and Appendix A of 40 CFR 60]

- A.11. Operating Rate During Testing: Testing of emissions shall be conducted with the emissions unit operation at permitted capacity. For compliance testing purposes, the maximum operation rates are 25 tons per hour of grain, 30 tons per hour of pellets, and 30 tons per hour of pellets for EU 002, EU 007, and EU 008, respectively. Permitted capacity is defined as 90 to 100 percent of the maximum operation rates allowed by the permit. If it is impractical to test at permitted capacity, an emissions unit may be tested at less than the minimum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test

SECTION 3. FACILITY-WIDE AND EMISSIONS UNIT SPECIFIC CONDITIONS (FINAL)

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load until a new test is conducted. Once the unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity.
[Rule 62-297.310(2), F.A.C.]

NOTIFICATION REQUIREMENTS

A.12. Test Notification: The permittee shall notify the Compliance Authority, at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the permittee. [Rules 62-4.070(3) and 62-297.310(7)(a)9., F.A.C.]

RECORDS AND REPORTS

A.13. 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.]

A.14. Monthly Log: In order to demonstrate compliance with operating condition number **A.1**, **A.2**, and **A.6.**, the permittee shall maintain a log at the facility for a period of at least 5 years from the date the data is recorded. The log at a minimum shall contain the following:

Monthly

- a) designation of the month and year of operation for which the records are being tabulated;
- b) consecutive 12-month total of material processed;
- c) consecutive 12-month total of sulfur dioxide emissions;
- d) consecutive 12-month total of natural gas or No. 2 fuel oil combusted; and
- e) No. 2 fuel oil documentation indicating sulfur percentage as determined by methods listed in Condition A.15 for the months when No. 2 fuel oil is combusted.

The monthly logs shall be completed by the end of the following month.

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 is available until such a time as a consecutive 12-month total can be maintained each month. [Rule 62-4.070(3), F.A.C.]

A.15. The fuel sulfur content, percent by weight, for liquid fuels shall be evaluated using either ASTM D2622-94, ASTM D4294-90(95), or ASTM 1552-90 or both ATSM D4057-88 and ASTM D129-95, or the latest edition of the above ASTM methods, or by any appropriate test method outlined in Rule 62-297.440(1), F.A.C. Alternately, after written notification to and written

SECTION 3. FACILITY-WIDE AND EMISSIONS UNIT SPECIFIC CONDITIONS (FINAL)

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approval from the Department, the permittee may use other DEP Air Program-approved methods, i.e. alternate sampling procedures, for sulfur in petroleum products.
[Rule 62-297.440, F.A.C.]

- A.16. Preventative Maintenance Plan (PMP) for Cyclones/fabric filters: The permittee shall maintain and implement a PMP to include a quarterly schedule for the maintenance and inspection of the cyclone/fabric after filters. Records of inspections, maintenance, and performance data of these control devices shall be retained by the emissions unit for a minimum of five (5) years and shall be made available to the Compliance Authority upon request.
- a. Quarterly PMP Log shall include, at a minimum, the following:
- i. Time, date, and signature of inspector.
 - ii. Inspection of cyclone for operational performance and any applicable after filters for tears and/or leaks.
 - iii. Inspection of belts, pulleys, fan assembly, and motors.
 - iv. Inspection of ductwork.
 - v. Inspection of collected dust holding bin.
 - vi. Inspection of area housekeeping.

[Rule 62-4.070(3), F.A.C.]

- A.17. Annual Operating Report: The owner or operator shall complete DEP Form No. 62-210.900(5), F.A.C., "Annual Operating Report for Air Pollutant Emitting Facility," for each calendar year and submit it either electronically using the latest Department Annual Operating Report software or by hard copy to the air compliance section of this office on or before March 1 of the following year in accordance with Rule 62-210.370(3), F.A.C. The emissions shall be computed in accordance with the provisions of Rule 62-210.370(2), F.A.C., for the purposes of the annual operating report. [Rule 62-210.370(3), F.A.C.]