



# Department of Environmental Protection

**Jeb Bush**  
Governor

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

**Colleen M. Castille**  
Secretary

## PERMITTEE:

Griffin Industries, Inc.  
1313 S.E. 52<sup>nd</sup> Avenue  
Starke, Florida 32091

I.D. Number: 0070004  
Permit/Cert Number: 0070004-012-AC  
Date of Issue: **Draft**  
Expiration Date:  
County: Bradford  
Latitude/Longitude: 29°46'38"N; 82°25'58"W  
UTM: E- (17) 389.7; N-3294.9.0  
Project: Permit Revision

This permit is issued under the provisions of Chapter(s) 403, Florida Statutes, and Florida Administrative Code Rule(s) 62-210, 62-212, 62-272, 62-296, 62-297 and 62-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the department and made a part hereof and specifically described as follows:

## PROJECT

For the revision of permit No. 0070004-010-AC. The fuel oils usages and sulfur content limitations are being revised in order to establish a facility wide SO<sub>2</sub> emissions cap of 249 tons per year.

## FACILITY DESCRIPTION

This facility is a rendering plant/bakery feed mills. It consists of three boilers, a bakery waste dryer, a waste heat evaporator, a feather rendering system, and two animal/poultry rendering systems.

The boilers are used to generate steam for process heat associated with the rendering activities.

The waste heat evaporator utilizes heat extracted from the steam generated by the cookers to evaporate excess moisture from various liquid products.

The heat utilized by the dryer is obtained from the combustion of sawdust/scrap paper/packaging in the biomass burner.

The continuous rendering system consists of a number of processes that grind, convey, cook and remove fluids from red meat/poultry inedible, and poultry feathers.

The emissions controls for this facility consist of a 10,000 cfm venturi scrubber/packed tower system, and two 40,000 cfm building air scrubbers. The emissions control units are designed for odor control and also to minimize the amount of gasses releases from the Red Meat Cooker, the Poultry Cooker, and the Feather Dryer from the rendering building before discharge to the atmosphere.

Based on the Air Construction Permit Application received July 21, 2004, this facility is a major source of Sulfur Dioxide (SO<sub>2</sub>).

**PERMITTEE:**

Griffin Industries, Inc.  
1313 S.E. 52<sup>nd</sup> Avenue  
Starke, Florida 32091

I.D. Number: 0070004  
Permit/Cert: 0070004-012-AC  
Date of Issue:  
Expiration Date:

**REGULATORY CLASSIFICATION**

The Regulated Emissions Units are defined as follows:

E.U.ID.No.	Description	Rule
006	No.1 Boiler	Rule 62-296.406, F.A.C., for Fossil Fuel Steam Generators with Less Than 250 Million BTU Per Hour Heat Input, New and Existing Emissions Units.
007	No.2 Boiler	
008	No.3 Boiler	
010	Bakery Waste Dryer	Rule 62-296.410, F.A.C., for Carbonaceous Fuel Burning Equipment.

Unregulated Emissions Units and/or Activities are defined as follows:

E.U.ID.No.	Description
001	Animal Poultry Rendering
002	Animal Poultry Rendering

**OPERATING LOCATION**

Located at 11313 S.E. 52<sup>nd</sup> Avenue, Starke, Bradford County, Florida.

**RELEVANT DOCUMENTS**

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

Permit Reopen for Cause dated April 19, 2005  
Request for additional information dated May 16, 2005  
Additional Information Received July 12, 2005  
Additional Information Received July 22, 2005  
Electronic Mail Received August 1, 2005

**PERMITTEE:**

Griffin Industries, Inc.  
1313 S.E. 52<sup>nd</sup> Avenue  
Starke, Florida 32091

I.D. Number: 0070004  
Permit/Cert: 0070004-012-AC  
Date of Issue:  
Expiration Date:

**GENERAL CONDITIONS:**

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of 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 the Department.
3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
5. This permit does 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 Department rules, unless specifically authorized by an order from the Department.
6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:
  - a. Have access to and copy any records that must be kept under the conditions of the permit;
  - b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
  - c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

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

**PERMITTEE:**  
Griffin Industries, Inc.  
1313 S.E. 52<sup>nd</sup> Avenue  
Starke, Florida 32091

I.D. Number: 0070004  
Permit/Cert: 0070004-012-AC  
Date of Issue:  
Expiration Date:

**GENERAL CONDITIONS:**

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

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

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

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

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

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 17-4.120 and 17-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

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

13. This permit also constitutes:

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

**PERMITTEE:**  
Griffin Industries, Inc.  
1313 S.E. 52<sup>nd</sup> Avenue  
Starke, Florida 32091

I.D. Number: 0070004  
Permit/Cert: 0070004-012-AC  
Date of Issue:  
Expiration Date:

**GENERAL CONDITIONS:**

14. The permittee shall comply with the following:

- a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
- b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
- c. Records of monitoring information shall include:
  - the date, exact place, and time of sampling or measurements;
  - the person responsible for performing the sampling or measurements;
  - the dates analyses were performed;
  - the person responsible for performing the analyses;
  - the analytical techniques or methods used; and
  - the results of such analyses.

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

**PERMITTEE:**  
Griffin Industries, Inc.  
1313 S.E. 52<sup>nd</sup> Avenue  
Starke, Florida 32091

I.D. Number: 0070004  
Permit/Cert: 0070004-012-AC  
Date of Issue:  
Expiration Date:

**SPECIFIC CONDITIONS:**

**ESSENTIAL POTENTIAL TO EMIT (PTE) PARAMETERS**

1. **Hours of Operation:** The hours of operation are not restricted, i.e. 24 H/D; 7 D/W; 52 W/Y, and 8760 Hours per year.  
[Rules 62-4.160(2), 62-210.200(PTE), F.A.C.]
2. **Maximum Operation Rate:** The maximum operation rate is listed below and shall not be exceeded without prior department approval:

Emissions Unit ID No.	Permitted Fuel (s)	Operation Rate
006 & 007	No.6 fuel oil, on-specification used oil, and waste cooking oil (WCO)	33.5 MMBtu/hr
008	No.6 fuel oil, on-specification used oil, and waste cooking oil (WCO)	32.7 MMBtu/hr
010	Paper/packaging material and sawdust	22.0 MMBtu/hr

3. **Material Usage and Fuel Limitations:** The maximum fuel/material usages for each emissions unit are as below:

Emissions Unit ID No.	Fuel Type	Sulfur Content (% By Wt)	Limitation
006, 007 & 008	No. 6 fuel oil	1.5	1,935,000 gallons/year
	On-specification used oil	0.5	320,000 gallons/year
	WCO	0.1	1,500,000 gallons/year
010	Paper/packaging material	N/A	1,760 lbs/hr
	Sawdust	N/A	2,750 lbs/hr

4. **Combustion of Paper/packaging Material & Sawdust:** A mixture of the two fuel materials shall be combusted provided that the maximum heat input rate is not exceeded.  
[Permit No. 0070004-010-AC]

**EMISSION LIMITATIONS AND PERFORMANCE STANDARDS**

5. **Emission Limits:** The permitted maximum allowable emissions rates for each pollutant are as follows:

Emissions Unit	Pollutant	Emissions Rate	FAC Rule
006, 007 & 008	Visible Emissions	20 % opacity, except 40 % for 2 minutes/hour	Rule 62-296.406(1)
	Particulate Matter	BACT Note (1)	Rule 62-296.406(2)
	Sulfur Dioxide	BACT Note (2)	Rule 62-296.406(3)
010	Visible Emissions	20 % opacity, except 40 % for 2 minutes/hour	Rule 62-296.410(2)(a), F.A.C

Note (1) Refer to specific condition No. 6 for more details.

Note (2) Refer to specific condition No. 7 for more details.

6. **Facility Wide Sulfur Dioxide Emissions Cap:** The maximum allowable SO<sub>2</sub> emissions from this facility shall not exceed 249 tons for each 12-consecutive month period.  
[Rules 62-4.160(2), 62-210.200 (23), F.A.C., and Applicant's Requested Facility-wide Emissions Cap to escape PSD review]

**PERMITTEE:**  
Griffin Industries, Inc.  
1313 S.E. 52<sup>nd</sup> Avenue  
Starke, Florida 32091

I.D. Number: 0070004  
Permit/Cert: 0070004-012-AC  
Date of Issue:  
Expiration Date:

**SPECIFIC CONDITION:**

7. **BACT for Particulate Matter (PM)**: The amount of particulate matter emissions from the boilers shall be limited by the firing of No. 6 fuel oil with a maximum sulfur content not to exceed 1.5% percent, by weight. [BACT issued on October 21, 1988 and BACT issued on January 25, 1991]
8. **BACT for Sulfur Dioxide**: The amount of sulfur dioxide emissions from the boilers shall be limited by the firing of No. 6 fuel oil with a maximum sulfur content not to exceed 1.5% percent, by weight. [BACT issued on October 21, 1988 and BACT issued on January 25, 1991]
9. **On-specification Used Oil**: The burning of “on-specification” used oil is allowed at this facility in accordance with all other conditions of this permit and the following additional conditions:
  - a. “On-specification” used oil is defined as that meets the 40 CFR 279 (Standards for the Management of Used Oil) specifications listed below.

<b>On-Spec Used Oil Specifications</b>	
<b>Note (1)</b>	
<b>Pollutant</b>	<b>Allowable Level</b>
Arsenic	5 ppm maximum
Cadmium	2 ppm maximum
Chromium	10 ppm maximum
Lead	100 ppm maximum
Total Halogens	1,000 ppm maximum
Flash Point	100°F minimum
PCBs	<b>Note (2)</b>

**Note (1)** The facility shall demonstrate compliance with the on-specification used oil specification by using approved EPA, DEP, or ASTM test methods or a certified on-specification used oil analysis upon Department’s request. Documentations shall be maintained on site to show that it meets the standards.

**Note (2)** On-specification used oil may be fired as follows:

1. At any time provided the maximum concentration of PCBs shall be less than 2 ppm and whether generated on or off-site. The analysis and recordkeeping requirements apply to each amount prior to blending even if to be blended with 90% virgin oil.
2. Only during normal operation temperature and not during startup or shutdown if the maximum concentration of PCBs is  $\geq 2$  but  $< 50$  ppm

[Permit No. AO04-251233, AC04-24963, AO04-189069, AO04-189070 and 0070004-006-AC]

10. **General Visible Emissions Standard (Facility Wide)**: Except for emissions unit that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, no person shall cause, let, permit, suffer or allow to be discharge into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as Number 1 on Ringelmann Chart (20% opacity). Compliance shall be determined by EPA Method 9, incorporated and adopted by reference in Rule 62-297, F.A.C.  
[Rule 62-296.320(4)(b) 1 and 62-296.320(4)(b) 4., F.A.C.]
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. Objectionable odor, is an odor present in the outdoor atmosphere which by itself or by combination with other odors, is or maybe harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which create a nuisance.  
[Rule 62-296.320(2) and 62-210.200 (181), F.A.C.]

**PERMITTEE:**  
Griffin Industries, Inc.  
1313 S.E. 52<sup>nd</sup> Avenue  
Starke, Florida 32091

I.D. Number: 0070004  
Permit/Cert: 0070004-012-AC  
Date of Issue:  
Expiration Date:

**SPECIFIC CONDITION:**

12. **Unconfined Particulate Matter (Facility Wide)**: 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 to prevent emissions of unconfined particulate matter at this facility may include but are not limited to:
- a. All roads, parking areas and yards at the facility are paved and maintained.
  - b. Loose particulate matter is periodically removed from roads and other paved areas around facility to prevent them from becoming airborne.
  - c. Loose particulate matter is periodically removed from buildings and work area to prevent them from becoming airborne.
  - d. Where possible, vegetation has been planted to minimize the generation of dust.
  - e. All conveyor systems, whether inside or outside the process building are either enclosed or covered.
- [Rule 62-296.320(4)(c), F.A.C.; and, proposed by applicant in the Permit Revision application received July 21, 2004]

**Excess Emissions**

13. Excess emissions resulting from malfunction shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized but in no case exceed two hours in any 24-hour period unless specifically authorized by the Department for longer duration.  
[Rule 62-210.700(1), F.A.C.]
14. Excess emissions resulting from startup or shutdown shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized.  
[Rule 62-210.700(2), F.A.C.]
15. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown or malfunction shall be prohibited.  
[Rule 62-210.700(4), F.A.C.]

**COMPLIANCE MONITORING AND TESTING REQUIREMENTS**

16. **Compliance Testing**: Test the emissions units during each federal fiscal year (October 1 – September 30).  
[Rule 62-297.310 (7)(a) 4., F.A.C.]

Emissions Unit	Pollutant	Test Method
006, 007, 008 & 010	VE	DEP Method 9

17. **Compliance Determination (Sulfur Dioxide)**: The permittee shall maintain records to demonstrate that the fuel oil consumed meets the sulfur content limitations as stated in Specific Condition No.3 and that the sulfur content was determined by ASTM methods ASTM D4057-88 and ASTM D129-91, ASTM D2622-94 or ASTM D4294- 90, adopted and incorporated by reference in Rule 62- 297.440(1).  
[Rules 62-213.440 and 62-296.406(3), F.A.C.]



**PERMITTEE:**  
Griffin Industries, Inc.  
1313 S.E. 52<sup>nd</sup> Avenue  
Starke, Florida 32091

I.D. Number: 0070004  
Permit/Cert: 0070004-012-AC  
Date of Issue:  
Expiration Date:

**SPECIFIC CONDITION:**

18. **Compliance Determination (Particulate Matter):** The emissions units shall be assumed to be in compliance with the Particulate Matter emission limits stated in Specific Condition No.7., if the unit complies with the Visible Emissions limitations stated in Specific Condition No.5. and Sulfur Dioxide Emissions limitations stated in Specific Condition No.8.  
[Rules 62-213.440 and 62-296.406(3), F.A.C.]
19. **Operating Rate During Testing:** Testing of emissions shall be conducted with the emissions unit operating at permitted capacity, which is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impracticable to test at permitted capacity, an emissions unit may be tested at less than the minimum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test load until a new test is conducted. Once the emissions 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.  
[Rules 62-297.310(2) & (2)(b), F.A.C.]
20. **Emissions Unit Operating Rate After Testing:** See Specific Condition No. 18.  
[Rule 62-297.310(2), F.A.C.]
21. **Compliance Test Notification:** At least 15 days prior to the date on which each formal compliance test is due to begin, the permittee shall provide written notification of the test to the Air Compliance Section of this Office. The notification must include the following information: the date, time, and location of each test; the name and telephone number of the facility's contact person who will be responsible for coordinating the test; and the name, company and telephone number of the person conducting the test.  
[Rule 62-297.310(7)(a) 9., F.A.C.]
22. **Special Compliance Tests:** When the Department, 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 a Department 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 the Department.  
[Rule 62-297.310(7), F.A.C.]
23. **Compliance Test Procedures:** Test procedures shall meet all applicable requirements of Chapter 62-297, F.A.C.  
[Rule 62-296.414(3)(b), F.A.C.]

**REPORTING AND RECORDKEEPING REQUIREMENTS**

24. **Records Keeping:** The owner or operator shall maintain the following records and retain them on site for five years.
  - Fuel oil usage for each calendar month. Fuel oil purchasing receipts for No.6 fuel oil and on-spec used oil shall be maintained.
  - Certified ASTM fuel oil analysis for each shipment of the No.6 fuel oil and on-spec used oil.
  - Fuel oil analysis for WCO.
  - SO2 emissions calculations for each calendar month.
  - The amount of sawdust and scrap paper/package used for fuel per month.
  - Data and computations used to estimate air pollutants emissions associate with this emissions unit.  
[Rule 62-213.440(1)(b), F.A.C.]

**PERMITTEE:**  
Griffin Industries, Inc.  
1313 S.E. 52<sup>nd</sup> Avenue  
Starke, Florida 32091

I.D. Number: 0070004  
Permit/Cert: 0070004-012-AC  
Date of Issue:  
Expiration Date:

**SPECIFIC CONDITION:**

25. **Compliance Report:** Reports of the required compliance tests shall be submitted as soon as practical but no later than 45 days after the last test is completed. Each test report shall include the maximum input / production rate at which this source was operated since the most recent test.  
[Rule 62-297.310(8)(b), F.A.C.]
26. **Annual Operating Report:** A DEP Form No. 62-210.900(5), "Annual Operating Report for Air Pollutant Emitting Facility" including the Emissions Report, shall be completed for each calendar year on or before March 1 of the following calendar year and submitted to the air compliance section of this office.  
[Rule 62-210.370(3), F.A.C.]

**ADMINISTRATIVE:**

27. The I.D. No. and Project name for this source shall be used on all correspondence.
28. **Modifications.** No emissions unit or facility subject to this permit shall be constructed or modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification. [Rule 62-210.300(1), F.A.C.]
29. **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(1), F.A.C.]
30. Any revision(s) to a permit (and application) must be submitted to the Department, in writing, and approved by the Department prior to implementation.

Executed in Jacksonville, Florida.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL PROTECTION

**Draft**

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