



TECHNICAL EVALUATION

APPLICANT

Darling Ingredients Inc.
4221 Alexandria Pike
Cold Spring, KY 41076

Hampton Facility
Facility ID No. 0070004

PROJECT

Project No. 0070004-030-AC
Application for Minor Source Air Construction Permit
Like-Kind Replacement of Scrubbers to EUs 014, 019, 020
New Source Review Reform Project

COUNTY

Bradford County, Florida

PERMITTING AUTHORITY

Florida Department of Environmental Protection
Northeast District Office
8800 Baymeadows Way W., Suite 100
Jacksonville, Florida 32256

November 29, 2017

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); 62-213 (Operation Permits for Major Sources of Air Pollution); 62-296 (Stationary Sources - Emission Standards); and 62-297 (Stationary Sources – Emissions Monitoring). Specifically, air construction permits are required pursuant to Chapters 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 in Rule 62-204.800, F.A.C.

Facility Description and Location

Hampton Facility is an existing animal/poultry byproducts rendering, used cooking oil and grease trap processing, and Secondary Protein Nutrient (SPN) fines process plant, which is categorized under Standard Industrial Classification Code No. 2077. The existing Hampton Facility is located in Bradford County at 11313 SE 52nd Avenue, in Starke, Florida. The UTM coordinates of the existing facility are Zone 17, 389.70 km East, and 3294.90 km North. This site is in an area that is in attainment (or designated as unclassifiable) for all air pollutants subject to Ambient Air Quality Standards (AAQS).

Facility Regulatory Categories

- The facility is not a major source of hazardous air pollutants (HAP).
- The facility does not operate units subject to the acid rain provisions of the Clean Air Act.
- The facility is a Title V major source of air pollution in accordance with Chapter 62-213, 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

The facility is proposing like-kind replacements of a venturi scrubber and two building air scrubbers that control VOC emissions and odor that exit emission units (EUs) 014, 019, 020.

Processing Schedule

11/22/17 Received the applicant e-mail request to exempt from a minor source air pollution construction permit the like-kind replacement of three scrubbers.

2. DEPARTMENT REVIEW

- EUs 014 and 019 are inedible animal by-products protein conversion production lines. Each production line grinds, conveys, cooks, and removes fluids from poultry inedibles. EU 020 is a production line that grinds, conveys, cooks, and removes fluids from blood and poultry feathers. All three EUs 014, 019, 020 utilize a 10,000 cubic feet per minute (CFM) venturi scrubber/packed tower system and two 40,000 cfm building air scrubbers to control VOC air emissions and odor.
- The facility-wide VOC limit is 249 tons per year (tpy). The facility adopted this VOC limit to avoid

regulation as a Prevention of Significant Deterioration (PSD) source.

- The facility has requested an exemption from air construction permitting citing the like-kind replacement of the venturi scrubber and two building air scrubbers. The DC Circuit Court decided on March 17, 2006 that any like-kind replacement that increases emissions of any air pollutant is a “physical change” subject to New Source Review.
- Because of the facility-wide VOC limit of 249 tpy and to establish that the like-kind replacements do not result in a “physical change” subject to New Source Review, the Department requires VOC emissions testing of the exhaust from EUs 014, 019, 020 after a like-kind new scrubber is installed. The VOC emissions test will re-establish the VOC emission factors that apply from the three EUs 014, 019, 020 and show whether VOC emissions from EUs 014, 019, and 020 increased as a result of the replacement scrubbers.

The Department also requires that each replacement scrubber air flow rate and scrubbing flow rate be recorded contemporaneous with each required VOC emissions test. The recording of the air flow rate and scrubbing flow rate are for the purposes of verifying that each replacement scrubber does not change the basic design parameters compared with the existing scrubber.

These tests shall be conducted to satisfy the replacement exemption of Rule 62-4.040, F.A.C.

- The three scrubbers and the associated emissions units 014, 019, 020 are not the subject of a regulation contained in Chapter 62-296, F.A.C. or the federal NSPS or NESHAP.

3. CONCLUSION

Pursuant to Rule 62.4.040(1)(b) of the Florida Administrative Code (F.A.C.) and for the reasons previously stated, the Office of Permitting and Compliance determines that the activity will not emit air pollutants, “... in sufficient quantity, with respect to its character, quality or content, and the circumstances surrounding its location, use and operation, as to contribute significantly to the pollution problems within the State, so that the regulation thereof is not reasonably justified.” Therefore, the project is exempt from the requirement to obtain an air construction permit. This determination may be revoked if the proposed activity is substantially modified or the basis for the exemption is determined to be materially incorrect. Pat Ryan 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 Department’s Northeast District Office, 8800 Baymeadows Way W., Suite 100, Jacksonville, Florida 32256, phone (904) 256-1657, or by email Pat.Ryan@dep.state.fl.us.