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EXECUTIVE DIRECTOR  
Janet L. Dougherty

DIVISION DIRECTORS

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Waste Management	Hooshang Boostani, P.E.
Water Management	Sam Elrabi, P.E.
Wetlands Management	Scott Emery, Ph.D.

Robert Berkhahn  
Plant Manager  
Cargill, Inc. – Grain Division  
200 North 19th Street  
Tampa, FL 33605

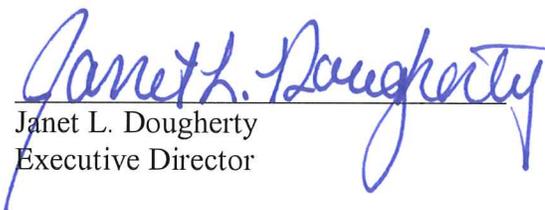
Re: 0570103-007-AC  
Minor Air Construction Permit  
Replacement of Baghouse (EU 001)

Dear Mr. Berkhahn:

On August 14, 2015, you submitted an application for an air construction permit to replace the baghouse on the Dockside Material Handling (EU 001) system with a new baghouse. This facility is located in Hillsborough County at 200 North 19th Street, Tampa, FL 33605.

After review of the application, the following documents have been prepared: the Technical Evaluation and Preliminary Determination; the Draft Permit and Appendices; the Written Notice of Intent to Issue Air Permit; and the Public Notice of Intent to Issue Air Permit. The Public Notice of Intent to Issue Air Permit is the actual notice that you must publish 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 Diana M. Lee, P.E. at 813-627-2600 x1276, or by e-mail at [lee@epchc.org](mailto:lee@epchc.org).

Sincerely,

  
Janet L. Dougherty  
Executive Director

Enclosures

JLD/KRZ/krz

*An agency with values of environmental stewardship, fairness, and cooperation*  
Roger P. Stewart Center  
3629 Queen Palm Drive, Tampa, FL 33619 - (813) 627-2600 - [www.epchc.org](http://www.epchc.org)  
*An Affirmative Action / Equal Opportunity Employer*

TECHNICAL EVALUATION  
AND  
PRELIMINARY DETERMINATION  
FOR

Cargill, Inc. – Grain Division

Hillsborough County

Air Construction Permit

Application Number

0570103-007-AC

Environmental Protection Commission of

Hillsborough County

Tampa, FL

September 10, 2015

## I. Project Description

A. Applicant: Robert Berkhahn  
Plant Manager  
Cargill, Inc. – Grain Division  
200 North 19th Street  
Tampa, FL 33605

B. Engineer: Robert E. Wallace, III, P.E.  
Environmental Engineering Consultants, Inc.  
5119 North Florida Avenue  
Tampa, FL 33603

P.E. No.: 21608

### C. Project and Location:

This permit authorizes the replacement of the baghouse on the Dockside Material Handling (EU 001) system with a new equivalent baghouse. The proposed baghouse will be a 20,000 acfm with a control efficiency of 99.98%. There will be no changes to the currently permitted throughput limit for EU 001.

This project has been assigned the following NEDS Source Classification Code No. 3-02-005-05 for Feed and Grain Terminal Elevators, Unloading (Receiving). The Standard Industrial Code for the project is No. 51. The project is located at 200 North 19th Street in Tampa, FL 33605. UTM coordinates for the facility are 17-358.2 E and 3092.1 N.

### D. Process and Controls:

Cargill Grain Division handles and stores bulk grain, grain by-products, and animal feed products (i.e. wheat, oat, corn and citrus pulp pellets). The facility receives materials from ships/barges which are unloaded at the Dockside material handling system and then directed to large silos located on the north and south side of the headhouse for storage and distribution. The materials can also be directed to either of two large enclosed warehouses if desired. The materials are transported using enclosed bucket elevators and belt conveyors. The Northside (EU 002) and Southside (EU 003) material handling systems are enclosed operations and the emissions generated from the transfer of products to the respective silos are controlled through use of individual baghouses.

Product can also be received from railcar or truck on the east side of the headhouse. It can then be transferred to either of two large warehouses, into the storage silos, or directly out to marine vessels. Trucks can be loaded on the west side of the building through two spouts controlled by a partial enclosure and the use of a water mist around the enclosure area. There is also a combined truck/railcar loadout spout on the east side of the headhouse. As desired, the material can be loaded into marine vessels by reversing the shipping and the receiving conveyor from the Dockside material handling system and diverting the product through a telescopic spout that extends down into the shiphold to reduce the drop height. The ship's hatch is kept partially closed during ship loading and tarps are used as needed to reduce particulate matter emissions.

The existing baghouse to be replaced is a 20,000 acfm Wiedenmann & Son, Inc. (Model: Filtromatic) with a control efficiency of 99.5%. The new proposed baghouse will be a 20,000 acfm Donaldson Company, Inc. (Model No. 226 RFWH 8 AW) with a control efficiency of 99.98% provided by the manufacturer specification. The new baghouse will either be similar to the Donaldson unit or at least equivalent to the existing baghouse. The facility did not request to change the currently permitted throughput limit of 2,167,851 tons/yr for the Dockside (EU 001) material handling equipment. The potential emissions from this EU 001 will remain at less than one 1 ton/year. Data from the ARMS database system shows that the actual hours of operation for this EU in the last 10 years has not exceeded 378 hrs/yr, which equates to less than 1 TPY of PM emissions when calculated using the grain loading of 0.03 gr/dscf and 20,000 acfm.

The facility-wide potential to emit (PTE) PM will remain as 48.2 TPY. The facility is subject to Rules 62-296.700 and 711, F.A.C. (PM RACT) based on the facility-wide potential emissions, however, the three emission units (EUs 001, 002 and 003) controlled by baghouses are exempt from PM RACT pursuant to Rule 62-296.700(2)(c), F.A.C., since their potential emissions individually are less than 1 ton/yr. A 5% opacity limit applies throughout the facility pursuant to PM RACT and Chapter 1-3.52, Rules of the EPC.

E. Application Information:

Received on: August 14, 2015  
Information Requested: N/A  
Application Complete: August 14, 2015

## II. Rule Applicability

This project is subject to the preconstruction review requirements of Chapter 403, Florida Statutes, Chapters, 62-204, 62-210, 62-212, 62-296, and 62-297, Florida Administrative Code (F.A.C.) and Chapter 1-3 of the Rules of the Environmental Protection Commission of Hillsborough County.

This project is subject to the requirements of Rule 62-212.300, General Preconstruction Review Requirements, F.A.C., since the project is a proposed modification of the facility for which an air construction permit is required.

This project is not subject to the requirements of Rule 62-212.400, Prevention of Significant Deterioration, F.A.C. or Rule 62-212.500, New Source Review for Nonattainment Areas, F.A.C., since the facility is a Synthetic Non-TV facility by state definition.

This project is not subject to the requirements of Rule 62-213, Operation Permits for Major Sources of Air Pollution, F.A.C., since the facility is a Synthetic Non-TV facility by state definition.

This project is subject to the requirements of Rule 62-296.320, General Pollutant Emission Limiting Standards, F.A.C., since the project is a source of particulate matter (PM) and visible emissions.

This project is not subject to the requirements of Rule 62-296.401 through 62-296.417, Specific Emission Limiting and Performance Standards, F.A.C., since there is no applicable source specific category in this rule.

This project is not subject to the requirements of Rule 62-296.500, Volatile Organic Compounds and Nitrogen Oxide Reasonably Available Control Technology, F.A.C., since there is not an applicable source specific category in this rule.

This project is not subject to the requirements of Rule 62-296.600, Reasonably Available Control Technology - Lead, F.A.C., since there is no applicable source specific category in this rule.

This project (EU 001) controlled by baghouse is exempt from Rule 62-296.700, Reasonably Available Control Technology, F.A.C., since the potential emissions are estimated to be less than 1 ton/yr. However, the facility is subject to Rules 62-296.700, F.A.C. (PM RACT), and specifically Rule 62-296.711, F.A.C. – Materials Handling, Sizing, Screening, Crushing and Grinding Operations since the facility is in a PM air quality maintenance area and the potential PM emissions are 48.2 tons/year.

This project is not subject to the requirements of Rule 62-204.800, Federal Regulations Adopted by Reference, F.A.C., since there is no applicable source specific category in this rule.

This project is subject to the requirements of Chapter 84-446, Laws of Florida and Chapter 1-3, Rules of the Environmental Protection Commission of Hillsborough County.

### III. Summary of Emissions

<b>Emission Units</b>	<b>Regulated Pollutant</b>	<b>Actual<sup>(1)</sup> Emissions* (TPY)</b>	<b>PTE<sup>(2)</sup> (TPY)</b>	<b>Increase (TPY)</b>	<b>Allowable Emissions</b>
001 - Dockside material handling with a new baghouse	PM	0.16	0.66	0.50	5% opacity

(1) The actual emissions are based the average of 2013 and 2014 AORs, which emissions are controlled by the existing baghouse.

(2) The potential emissions from the Dockside material handling operation will be controlled by the new baghouse, which is assumed to be similar to the existing baghouse, were estimated using an emission factor of 0.061 lb/ton based Table 9.9.1 of AP-42, a baghouse control efficiency of 95.5% provided by the manufacture specification and 2,167,851 tons/yr of throughput limit requested by the facility.

Inventory of Title III pollutants is estimated to be less than 10 TPY (none) individually and less than 25 TPY (none) collectively.

### IV. Conclusions:

The emission limits proposed by the applicant will meet all of the requirements of Chapters 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C., and Chapter 1-3, Rules of the Commission.

The General and Specific Conditions listed in the proposed permit (attached) will assure compliance with all the applicable requirements of Chapters 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C.

### V. Proposed Agency Action:

Pursuant to Section 403.087, Florida Statutes and Rule 62-4.070, Florida Administrative Code the Environmental Protection Commission of Hillsborough County hereby gives notice of its intent to issue a permit to construct the aforementioned air pollution source in accordance with the revised draft permit and its conditions as stipulated (see attached).

## WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

*In the Matter of an*

*Application for Air Permit by:*

Cargill, Inc. – Grain Division  
200 North 19th Street  
Tampa, FL 33605

Project No. 0570103-007-AC  
Minor Air Construction Permit  
Hillsborough County, Florida

*Authorized Representative:*

Robert Berkhahn

*Baghouse Replacement for EU 001 -  
Dockside Material Handling*

**Facility Location:** Cargill, Inc. – Grain Division operates a bulk grain, grain by-products, and animal feed products (i.e. wheat, oat, corn and citrus pulp pellets) handling facility located at 200 North 19th Street, Tampa, FL 33605.

**Project:** This project authorizes the replacement of the Dockside Material Handling (EU 001) equipment baghouse with an equivalent baghouse. There are no other changes to the facility.

**Permitting Authority:** Applications for air construction and operation 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 perform the proposed work. The Permitting Authority responsible for making a permit determination for this project is the Environmental Protection Commission of Hillsborough County. The Permitting Authority's physical address is: 3629 Queen Palm Dr., Tampa, FL 33619. The Permitting Authority's mailing address is: 3629 Queen Palm Dr., Tampa, FL 33619. The Permitting Authority's telephone number is 813/627-2600.

**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 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 Diana M. Lee, P.E. for additional information at the address or phone number listed above.

## WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

**Notice of Intent to Issue Permit:** The Permitting Authority 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 Permitting Authority 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 Permitting Authority at 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 Permitting Authority 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 62-110.106(11), F.A.C.

**Comments:** The Permitting Authority 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 Permitting Authority 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 Permitting Authority 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. 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 Permitting Authority 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. A petition for administrative hearing must contain the information set forth below and must be filed (received) in the Legal Department of the EPC at 3629 Queen Palm Drive, Tampa, Florida 33619, Phone 813-627-2600, Fax 813-627-2602, before the deadline. 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.

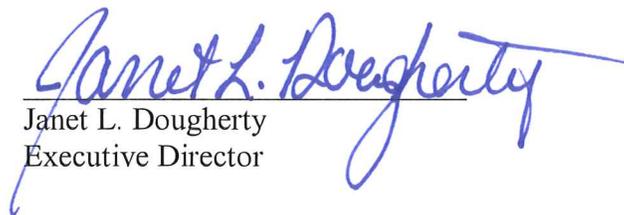
## WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

A petition that disputes the material facts on which the Permitting Authority'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, any email address, telephone number and any facsimile number of the petitioner; the name, address, any email address, telephone number, and any facsimile 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 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 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 the Permitting Authority'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 the Permitting Authority 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.

Executed in Hillsborough County, Florida.

  
Janet L. Dougherty  
Executive Director

**WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT**

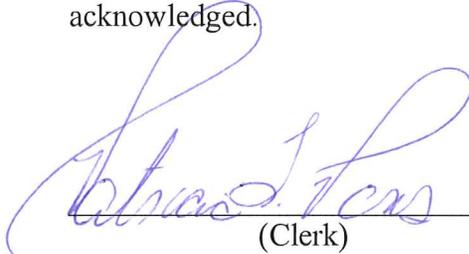
**CERTIFICATE OF SERVICE**

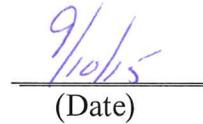
The undersigned duly designated deputy agency clerk hereby certifies that this Written Notice of Intent to Issue Air Permit package (including the Written Notice of Intent to Issue Air Permit, the Public Notice of Intent to Issue Air Permit, the Technical Evaluation and Preliminary Determination and the Draft Permit) was sent by electronic mail (or a link to these documents made available electronically on a publicly accessible server) with received receipt requested or by certified mail before the close of business on the date indicated below to the persons listed below.

Robert Berkhahn, Cargill, Inc. – Grain Division  
Robert E. Wallace, III, P.E. – EEC, Inc. (rwallace@eec-tampabay.com)

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**  
**ENVIRONMENTAL PROTECTION COMMISSION**  
**OF HILLSBOROUGH COUNTY**

Draft Minor Air Construction Permit  
Project No. 0570103-007-AC  
Cargill, Inc. – Grain Division  
Hillsborough County, Florida

**Applicant:** The applicant for this project is Cargill, Inc. – Grain Division. The applicant's authorized representative and mailing address is: Robert Berkahn, 200 North 19th Street, Tampa, FL 33605.

**Facility Location:** Cargill, Inc. – Grain Division operates a bulk grain, grain by-products, and animal feed products (i.e. wheat, oat, corn and citrus pulp pellets) handling facility located at 200 North 19th Street, Tampa, FL 33605.

**Project:** This project authorizes the replacement of the Dockside Material Handling (EU 001) system baghouse with an equivalent baghouse. There are no other changes to the facility.

**Permitting Authority:** Applications for air construction and operation 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 perform the proposed work. The Permitting Authority responsible for making a permit determination for this project is the Environmental Protection Commission of Hillsborough County. The Permitting Authority's physical address is: 3629 Queen Palm Dr., Tampa, FL 33619. The Permitting Authority's mailing address is: 3629 Queen Palm Dr., Tampa, FL 33619. The Permitting Authority's telephone number is 813/627-2600.

**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 physical address indicated above for the Permitting Authority. 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 Diana M. Lee, P.E. for additional information at the address and phone number listed above.

**Notice of Intent to Issue Air Permit:** The Permitting Authority 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 Permitting Authority 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 Permitting Authority 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 Permitting Authority 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

Permitting Authority 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. 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 Public Notice or receipt of a written notice, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority 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. A petition for administrative hearing must contain the information set forth below and must be filed (received) in the Legal Department of the EPC at 3629 Queen Palm Drive, Tampa, Florida 33619, Phone 813-627-2600, Fax 813-627-2602, before the deadline. 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 Permitting Authority'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, any email address, telephone number and any facsimile number of the petitioner; the name, address, any email address, telephone number, and any facsimile 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 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 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 the Permitting Authority'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 the Permitting Authority 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.

COMMISSION

Kevin Beckner	Lesley "Les" Miller, Jr.
Victor D. Crist	Sandra L. Murman
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EXECUTIVE DIRECTOR  
Janet L. Dougherty

ENVIRONMENTAL PROTECTION COMMISSION OF  
HILLSBOROUGH COUNTY, as Delegated by

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

NOTICE OF PERMIT

Mr. Robert Berkhahn  
Plant Manager  
Cargill, Inc. – Grain Division  
200 North 19th Street  
Tampa, FL 33605

**DRAFT**

Re: Hillsborough County - AP

Dear Mr. Berkhahn,

Enclosed is Permit No. 0570103-007-AC to modify the material handling operation, issued pursuant to Section 403.087, Florida Statutes. This permit authorizes the replacement of the Dockside Material Handling (EU 001) system baghouse. There are no other changes at the facility.

Any party to this order (permit) has the right to seek judicial review of the permit pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the EPC in the Legal Department at 3629 Queen Palm Dr, Tampa, FL, 33619; 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 of Appeal must be filed within 30 days from the date this Notice is filed with the clerk of the EPC.

Executed in Tampa, Florida.

Sincerely,

**DRAFT**

Janet L. Dougherty  
Executive Director

JD/KRZ/krz

CERTIFICATE OF SERVICE

This is to certify that this NOTICE OF PERMIT and all copies were sent by certified mail or electronic mail before the close of business on \_\_\_\_\_ to the listed persons.

Clerk Stamp

FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated clerk, receipt of which is hereby acknowledged.

**DRAFT**

\_\_\_\_\_  
Clerk

\_\_\_\_\_  
Date

Robert Berkhahn, Cargill, Inc. – Grain Division  
Robert E. Wallace, III, P.E. – EEC, Inc. (rwallace@eec-tampabay.com)

**DRAFT**

**COMMISSION**

Kevin Beckner	Lesley "Les" Miller, Jr.
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Al Higginbotham	



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Wetlands Management	Scott Emery, Ph.D.

**DRAFT**

**PERMITTEE:**

Cargill, Inc. – Grain Division  
200 North 19th Street  
Tampa, FL 33605

**PERMIT/CERTIFICATION**

Permit No: 0570103-007-AC  
County: Hillsborough  
Expiration Date: October 1, 2018  
Project: Baghouse Replacement for Dockside  
Material Handling System (EU 001)

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rules 62-204, 62-210, 62-212, 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 EPC and made a part hereof and specifically described as follows:

This permit authorizes the replacement of the baghouse on the Dockside Material Handling (EU 001) system with a new baghouse. The existing baghouse to be replaced is a 20,000 acfm Wiedenmann & Son, Inc. (Model: Filtramatic) with a control efficiency of 99.5%. The new proposed baghouse will be a 20,000 acfm Donaldson Company, Inc. (Model No. 226 RFWH 8 AW) with a control efficiency of 99.98% provided by the manufacturer specification. The new baghouse will either be similar to the Donaldson unit or at least equivalent to the existing baghouse.

Cargill, Inc., Grain Division is a material handling facility, which handles bulk grains, grain by-products, and animal feed products (i.e. wheat, oat, corn and citrus pulp pellets). The facility receives materials from ships/barges which are unloaded at the Dockside material handling system and then directed to large silos located on the north and south side of the headhouse for storage and distribution. The materials can also be directed to either of two large enclosed warehouses if desired. The materials are transported using enclosed bucket elevators and belt conveyors. The Northside (EU 002) and Southside (EU 003) material handling systems are enclosed operations and the emissions generated from the transfer of products to the respective silos are controlled through use of individual baghouses.

Product can also be received from railcar or truck on the east side of the headhouse. It can then be transferred to either of two large warehouses, into the storage silos, or directly out to marine vessels. Trucks can be loaded on the west side of the building through two spouts controlled by a partial enclosure and the use of a water mist around the enclosure area. There is also a combined truck/railcar loadout spout on the east side of the headhouse. As desired, the material can be loaded into marine vessels by reversing the shipping and the receiving conveyor from the Dockside material handling system and diverting the product through a telescopic spout that extends down into the shiphold to reduce the drop height. The ship's hatch is kept partially closed during ship loading and tarps are used as needed to reduce particulate matter emissions.

*An agency with values of environmental stewardship, fairness, and cooperation*

**Roger P. Stewart Center**

**3629 Queen Palm Drive, Tampa, FL 33619 - (813) 627-2600 - [www.epchc.org](http://www.epchc.org)**

*An Affirmative Action / Equal Opportunity Employer*

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The facility is subject to Rules 62-296.700 and 711, F.A.C. (PM RACT) based on the facility-wide potential emissions, however, the three emission units (EUs 001, 002 and 003) controlled by baghouses are exempt from PM RACT pursuant to Rule 62-296.700(2)(c), F.A.C., since their potential emissions individually are less than 1 ton/yr. A 5% opacity limit applies throughout the facility pursuant to PM RACT and Chapter 1-3.52, Rules of the EPC.

Location: 200 North 19th Street, Tampa, FL 33605

UTM: 17-358.2 E 3092.1 N

NEDS NO: 0103

Point ID: 001 - Dockside Material Handling System (Ship Unloading)

References Permit No.: 0570103-006-AO

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PERMITTEE:  
Cargill, Inc. – Grain Division

PERMIT/CERTIFICATION NO.: 0570103-007-AC  
PROJECT: Baghouse Replacement for Dockside  
Material Handling System (EU 001)

SPECIFIC CONDITIONS:

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1. A part of this permit is the attached General Conditions. [Rule 62-4.160, F.A.C.]
2. All applicable rules of the Environmental Protection Commission of Hillsborough County including design discharge limitations specified in the application shall be adhered to. The permit holder may also need to comply with county, municipal, federal, or other state regulations prior to construction. [Rule 62-4.070(7), F.A.C.]
3. Issuance of this permit does not relieve the permittee from complying with applicable emission limiting standards or other requirements of Chapters 62-204, 62-210, 62-212, 62-296 and 62-297, F.A.C. or any other requirements under federal, state, or local law. [Rule 62-210.300, F.A.C.]
4. As requested by the permittee, in order to limit the potential to emit and exempt EU 001 from PM RACT, the maximum particulate matter emissions shall be less than 1 ton/yr for this emission unit. [Rules 62-296.700(2)(c), 62-210.200 – “Potential to Emit”, and 62-4.070(3), F.A.C.; and Permit Application submitted August 14, 2015]
5. Visible emissions from the Dockside Material Handling System operation shall not exceed 5% opacity. [Chapter 1-3.52, Rules of the EPC; and Permit Application submitted August 14, 2015]
6. In order to assure compliance with the limitations in Specific Condition No. 4, the following limitations shall apply: [Rule 62-4.070(3), F.A.C. and Construction Permit No. 0570103-003-AC]
  - A) The maximum total material transfer rate for the Dockside Material Handling System shall not exceed 2,167,851 tons of material in any 12 consecutive month period.
  - B) The maximum Dockside material transfer rate to transport the material from the ship or barge to the storage silos shall not exceed 600 tons per hour.
  - C) Ship unloading shall be accomplished using the enclosed bucket marine unloader.
  - D) All dust laden air generated during these operations shall be vented back to the baghouse controlling each respective emission unit.
  - E) Actual emissions shall be determined using the following factors:
    - i) Emissions factor - 0.061 lb PM/ton product/drop
    - ii) Baghouse control efficiencies - 99.5%
    - iii) Number of drops for the Dockside material handling system: 2
  - G) The facility shall process only bulk grains, grain by-products, and animal feed products.
7. Test EU 001 for visible emissions the first time material is handled through the Dockside material handling system after the installation of the new baghouse, and annually thereafter. Visible emission observations shall be made from the point of highest opacity for the emission unit, which may include the shiphold opening during observation of the Dockside material handling system. Testing procedures shall be consistent with the requirements of Rule 62-297.310, F.A.C. [Rules 62-4.070(3) and 62-297.310(7), F.A.C.; Chapter 1-3.52, Rules of the EPC]

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PERMITTEE:  
Cargill, Inc. – Grain Division

PERMIT/CERTIFICATION NO.: 0570103-007-AC  
PROJECT: Baghouse Replacement for Dockside  
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SPECIFIC CONDITIONS:

8. Testing of emissions shall be conducted with the sources operating at capacity. Capacity is defined as 90-100% of the rated capacity of 600 ton/hr for the Dockside material handling system. If it is impracticable to test at capacity, then the source may be tested at less than capacity; in this case subsequent source operation is limited to 110% of the test load until a new test is conducted. Once the unit is so limited, then operation at higher capacities is allowed for no more than fifteen days for purposes of additional compliance testing to regain the rated capacity in the permit, with prior notification to the EPC. Failure to submit the input rates and actual operating conditions may invalidate the test. [Rules 62-4.070(3) and 62-297.310(2), F.A.C.]

9. Compliance with the emission limitations of Specific Condition No. 5 shall be determined using EPA Method 9 contained in 40 CFR 60, Appendix A and adopted by reference in Rule 62-297, F.A.C. The minimum requirements for stack sampling facilities, source sampling and reporting, shall be in accordance with Rule 62-297, F.A.C. and 40 CFR 60, Appendix A. [Rule 62-297, F.A.C.; Chapter 1-3.52, Rules of the EPC]

10. The EPA Method 9 test observation period for the permitted emission units shall be a minimum of thirty (30) minutes in duration and shall be conducted under the same operating conditions as the test specified in Specific Condition No. 8. Two copies of the test data shall be submitted to the Air Management Division of the Environmental Protection Commission of Hillsborough County within 45 days of testing. [Rule 62-297, F.A.C.]

11. The permittee shall notify the Air Compliance Section of the Environmental Protection Commission of Hillsborough County 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 contact person who will be responsible for coordinating and having such test conducted. [Rule 62-297.310(7)(a)9., F.A.C.]

12. The permittee shall not cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor. [Rule 62-296.320, F.A.C.]

13. In order to demonstrate compliance with the limitations of Specific Condition No. 6.A), the permittee shall maintain monthly records of operations for the most recent three year period. The records shall be made available to the Environmental Protection Commission of Hillsborough County, State or Federal air pollution agency upon request. The records shall include, but not limited to, the following: [Rules 62-4.070(3) and 62-4.160(14), F.A.C.]

- A) Month, Year
- B) Source Identification
- C) Monthly total summary of material processed at the Dockside material handling system
- D) Maintain a rolling total of the latest twelve months for items in Specific Condition No. 13.C)

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14. The air pollution control equipment (dust collectors) shall be maintained in good repair to perform adequately the function for which they were intended. Maintenance shall include, but is not limited to, monthly inspections and replacement or repair of faulty equipment when necessary or as required by the

PERMITTEE:  
Cargill, Inc. – Grain Division

PERMIT/CERTIFICATION NO.: 0570103-007-AC  
PROJECT: Baghouse Replacement for Dockside  
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SPECIFIC CONDITIONS:

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manufacturer. Any maintenance/repair performed should be recorded. Maintenance records shall be maintained for the most recent 12-month period and made available for inspection upon request. [Rule 62-4.070(3), F.A.C.]

15. When the Environmental Protection Commission of Hillsborough County (EPC) 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 Rules 62-204, 62-210, 62-212, 62-296, or 62-297, F.A.C., or in a permit issued pursuant to those rules is being violated, it may require the owner or operator of the source to conduct compliance tests which identify the nature and quantity of pollutant emissions from the source and to provide a report on the results of said tests to the EPC. [Rule 62-297.310(7)(b), F.A.C.]

16. Submit to the Environmental Protection Commission of Hillsborough County each calendar year on or before April 1, completed DEP Form 62-210.900(5), "Annual Operating Report for Air Pollutant Emitting Facility", for the preceding calendar year. [Rules 62-210.370(3)(a)3. and (3)(c), F.A.C.]

17. All reasonable precautions shall be taken to prevent and control generation of unconfined emissions of particulate matter in accordance with the provision in Rule 62-296.320, F.A.C. These provisions are applicable to any source, including, but not limited to, vehicular movement, transportation of materials, construction, alterations, demolition or wrecking, or industrial related activities such as loading, unloading, storing and handling. Reasonable precautions shall include the following:  
[Rules 62-4.070(3) and 62-296.320(4)(c), F.A.C.]

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- A) Wet unpaved roadways as often as needed.
- B) Sweep paved roadways as often as needed.
- C) Attend any accidental spills or upsets promptly and effectively. Curtail or stop operations, if necessary.
- D) Post speed limit signs for vehicular traffic.
- E) Enclose or cover the material handling system conveyors, bucket elevators, etc., as necessary.
- F) Curtail operations if winds are re-entraining particulate matter from the ground.
- G) Exercise good housekeeping practices at all times and make plant personnel aware of the environmental requirements under this permit.
- H) Keep warehouse openings closed as much as practical, especially during material transfer operations.

18. The permittee shall provide timely notification to the Environmental Protection Commission of Hillsborough County prior to implementing any changes that may result in a modification to this permit pursuant to Rule 62-210.200(187), F.A.C., Modification. The changes do not include normal maintenance, but may include, and are not limited to, the following, and may also require prior authorization before implementation: [Rules 62-210.300 and 62-4.070(3), F.A.C.]

PERMITTEE:  
Cargill, Inc. – Grain Division

PERMIT/CERTIFICATION NO.: 0570103-007-AC  
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Material Handling System (EU 001)

SPECIFIC CONDITIONS:

- A) Alteration or replacement of any equipment or major component of such equipment.
- B) Installation or addition of any equipment which is a source of air pollution.

19. If the permittee wishes to transfer this permit to another owner, an "Application for Transfer of Air Permit" (DEP Form 62-210.900(7)) shall be submitted, in duplicate, to the Environmental Protection Commission of Hillsborough County within 30 days after the sale or legal transfer of the permitted facility. [Rule 62-4.120, F.A.C.]

20. A minimum of two copies of an application for an operating permit revision shall be submitted to the Environmental Protection Commission of Hillsborough County within 60 days of completion of the initial compliance testing or at least 90 days prior to the expiration date of this permit, whichever occurs first. The application shall include an Operation & Maintenance Plan for the new baghouse. [Rules 62-4, 62-210, 62-296.700, F.A.C.]

ENVIRONMENTAL PROTECTION COMMISSION  
OF HILLSBOROUGH COUNTY

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Janet L. Dougherty  
Executive Director

## ATTACHMENT - 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 403.141, 403.727, or 403.859 through 403.861, Florida Statutes (F.S.). 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), 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. Not applicable to Air Permits.
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, are 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 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 reasonable necessary to assure compliance with this permit or Department rules.

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

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:
  - a. A description of and cause of 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 damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

## ATTACHMENT - GENERAL CONDITIONS

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 Section 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 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 Rule 62-4.120 and 62-730.300 F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

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

13. This permit also constitutes:

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

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:
  - 1. the date, exact place, and time of sampling or measurements;
  - 2. the person responsible for performing the sampling or measurements;
  - 3. the dates analyses were performed;
  - 4. the person responsible for performing the analyses;
  - 5. the analytical techniques or methods used;
  - 6. 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 the 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.

16. Not applicable to Air Permits.

17. Not applicable to Air Permits.