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**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

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,

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 10/5/15 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.

Patricia L. Peters 10/5/15
Clerk Date

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

FINAL DETERMINATION

FOR

Cargill, Inc. – Grain Division

Hillsborough County

Air Construction Permit

Application Number

0570103-007-AC

Environmental Protection Commission of

Hillsborough County

Tampa, FL

October 5, 2015

The Environmental Protection Commission of Hillsborough County mailed a public notice package on September 10, 2015 to Cargill, Inc. – Grain Division, 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.

The construction 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: Filtramic) 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. There are no other changes to the facility.

The Public Notice of Intent to Issue was published on September 18, 2015 in the La Gaceta.

No comments were received since the Intent was published.

The final action of the Environmental Protection Commission of Hillsborough County is to issue the final permit.



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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: Filtramic) 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

An Affirmative Action / Equal Opportunity Employer

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

PERMITTEE:
Cargill, Inc. – Grain Division

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

SPECIFIC CONDITIONS:

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]

PERMITTEE:
Cargill, Inc. – Grain Division

PERMIT/CERTIFICATION NO.: 0570103-007-AC
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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)

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:
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SPECIFIC CONDITIONS:

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.]

- 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.]

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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


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.