

APPENDIX AP-1

**Golden Peanut Company LLC
Greenwood, FL**

ENVIRONMENTAL COMPLIANCE PLAN
Facility ID No. 0630041

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Introduction

This plan provides information demonstrating the owner's commitment to operate this facility in compliance with DEP Operation Permit requirements and provide assurance that all aspects of process and equipment maintenance at this facility are in accord with applicable environmental laws and rules.

This plan was developed in accordance with specific requirements of this facility and provides management and operator(s) with adequate information and description regarding the design, operation and maintenance features of this facility. It is used to train new plant operator(s) and provide continuous education.

Corporate Commitment

Golden Peanut Company adheres to a strong company-wide environmental program. The company relies on past experience to assure quality plant operation and employee training, as well as protection of surrounding environment.

It is the company's belief that commitment from all its' employees, especially top management, is what gets the job done. All of our employees realize that it is good business sense to protect the environment.

Facility Description

This facility is operated as a receiving station for raw peanuts produced by local farmers. Process is limited to receiving, drying, cleaning and storing of raw peanuts in facility warehouses. From these warehouses, peanuts are then shipped to processing plants (not part of this facility) where they are shelled, roasted, packaged, etc. Small amount of raw peanuts are sold at this facility to the buying public.

Peanuts are brought to the facility by producers (farmers) in tractor towed trailers or similar means of transport. Peanuts picked in the field contain a certain amount of debris. The amount of debris depends on individual source, time of harvest, year and weather conditions. Moisture content of raw peanuts can also vary due to similar circumstances. Depending on the above factors, raw peanuts can be processed several ways:

1. If raw peanuts are judged to have average moisture content and do not contain excessive amount of debris, they are unloaded directly from farm trailers into warehouse(s) using fully enclosed vertical bucket elevators and enclosed chutes that terminate inside warehouse. Each warehouse at this facility is equipped with such unloading station.
2. If load of raw peanuts brought into this facility on a farm trailer has too high of a moisture content, then they are dried prior to cleaning and/or loading into warehouses. Drying process consists of locating trailer loads of raw peanuts under sheds (roofs only). Hot air is then blown inside trailers through flexible ducts connected to trailers using multiple air heaters. Such heaters use LP gas burners and electric fans. Since peanuts are not disturbed during drying process resultant PM emissions are negligent. Only emissions resulting from burning of the fuel are emitted by this process.
3. If load of raw peanuts brought into this facility on a farm trailer contain excessive amount of debris, they are first processed in a cleaning station and then loaded into warehouse. Emissions created by the cleaning process are controlled by cyclones.

4. In case raw peanuts brought into this facility on a farm trailer are not to be stored on site, they can be transferred from farm supply trailers to semi truck trailers inside the transfer station. Emissions from this process are controlled by cyclones. After transfer, raw peanuts are hauled from the site. At present time, transfer facility is not in use, but Golden Peanut is keeping this activity permitted for possible future use.

From warehouses located on this site, stored peanuts are removed via open belt conveyors to be loaded onto semi-truck trailers.

Process flow sheet(s) depicting the process are part of permit application package exhibited as document "C" and should be referred to as part of this plan.

Operator Training

Existing plant operator has been with the company many years. Regional manager(s) participate in additional training of plant operator(s) and training of new operator(s), especially concerning environmental issues as described in this plan. Such training program is initiated within 30 days of issuance of DEP Operation Permit and repeated yearly. Any changes in operation procedures that might improve the operation of this facility will be incorporated and plan revised accordingly.

Facility operator is responsible to maintain all records pertaining to facilities activity. All reports are filed in his/her office ready to be examined by DEP field inspector.

Beside training required to conduct daily process activities at this facility, operator(s) are trained and knowledgeable to address environmental aspects created by the process itself and/or required facility maintenance to ensure that no excessive air emissions occur. This includes emissions from process control equipment such as cyclones, emissions from material handling (peanuts and trash) equipment such as blowpipes/ductwork, trash chutes dumping trash from cyclones to trash containers/trailers and process of conveying peanuts from cleaners to awaiting trailers. Also emissions that are created by the drying of peanuts and/or transfer of peanuts from warehouses into trailers and vice a versa. Operator is trained to be aware of fugitive emissions created by vehicular traffic along plant roads or trash disposed on the property which in turn can become airborne by wind. Proper cleaning and/or wetting of roads keeps such emissions to minimum. Also posted and enforced speed limits along facility roads minimize such fugitive emissions.

In general, management ensures that operators are trained, within reason, to recognize excessive emissions from sources described above, to take immediate action when excessive emissions are observed and to record their observations and actions taken on forms attached to this plan.

Documents recording training sessions indicating dates and personnel present along with matters discussed are kept as part of records pertaining to this plan.

Besides periodic reviewing of Environmental Compliance Plan with plant operator(s), management also periodically reviews DEP Operation Permit with plant operator(s). Although every detail of operation permit is important, following details stand out:

Plant is permitted to operate at maximum process rates as follows

1. Unloading – 5,000 TPY
2. Cleaning – 250 TPY
3. Transferring – 500 TPY
4. Drying – 5,000 TPY
5. LP Fuel usage for drying – 30,000 GPY

Monthly production records are kept by facility operator and totaled at the end of the year. Totals cannot exceed maximum yearly amounts as shown above. Fuel usage is based on the amount of fuel purchased and records of such purchases is kept as part of this plan. Such records are kept in on form, copy of which is attached to this plan.

Any need to increase above rates require that DEP permit be revised before such increases occur.

Application to renew DEP operation permit needs to be initiated 90 prior to permit expiration.

Facility Monitoring

Since this facility uses cyclones as air emissions controlling devices only and cyclones are not equipped with performance monitoring devices such as pressure differential gauges or opacity monitors, the only reasonable monitoring of their satisfactory performance depends on actual observation of cyclone outlet(s). Although facility is not obligated to perform yearly visible emissions on these cyclones by a State certified VE reader, never the less, plant operator is acquainted with terms of visible emissions tests, opacities and observation of visible emissions coming from outlets of cyclones. Also operator is trained to note excessive fugitive emissions coming from processes such as peanut conveying apparatus or trash collecting systems. He is trained to check for integrity and functionality of all equipment involved in such processes especially raw peanut cleaning and/or transferring process. He is trained to recognize importance of such integrity and physical condition of all such equipment. For example, operator must recognize the fact that tears or holes in blowpipes/ductwork that convey peanuts or trash will result in excessive emissions. Also that holes in process equipment such as cleaning housing will do the same. Operator is trained to recognize importance of well fitted flexible connectors between equipment and/or exit chutes which discharge product or trash into receiving equipment such as trailers, trash buggies or bins. Inadequately maintained flexible chutes will allow excessive fugitive air emissions.

Operator is trained to observe and record fugitive emissions created by strewn trash throughout facility which can be picked up and become airborne by the wind. Operator is also trained to insure facility is inspected and cleaned once weekly for such trash. He also is trained to recognize excessive fugitive emissions created by vehicular traffic and what to do to minimize such emissions. He is trained to use water sprays and other means of controlling such emissions.

To summarize, facility monitoring and record keeping of such activity the following action is taken.

1. Initial inspection of facility and equipment at the beginning of each processing season.

2. Observation of cyclone outlets, fugitive air emissions associated with equipment and discharge chutes from cyclones are performed and recorded weekly when such equipment is in operation.
3. Monthly check of fugitive emissions from sources such as trash piles and vehicular traffic. Plant operator is responsible for observation and recording of this data.

All above activity is recorded on forms, samples of which are attached to this plan.

All malfunctions or failures of equipment and corrections taken are recorded on a form, copy of which is attached.

O & M Plan

Successful operation of this facility depends on all equipment operating correctly and being regularly maintained. No process will commence if equipment involved is not in good in order.

Records of equipment maintenance and replacement are kept as part of this plan. Equipment maintenance and replacement is recorded on a form, copy of which is attached.

Records

Records of monitoring, inspections and maintenance data of cyclones and auxiliary equipment are stored in plant operator's office for a minimum of two years and shall be made available to DEP upon request.

Following documents are on file:

- Copy of current DEP construction and operations permit

- Copy of current DEP operation permit application

- Records of weekly, monthly and yearly inspections

- Records of monthly production rates and fuel totals

- Records of yearly production rates and fuel totals

- Fuel delivery slips indicating amount of fuel delivered during the year.

- Copy of this Compliance Plan

- Records of training sessions

- Records of malfunctions or failures of the above and corrective actions taken.

- Maintenance records on the cyclones and associated equipment repairs.

Periodic Plan Review

This Environmental Compliance Plan is reviewed at least annually. This review includes evaluation of the effectiveness of the plan and incorporates changes necessary for the plan to be continuously administered.

This plan shall be updated as operations change but no less frequently than upon renewal of DEP Operations Permit. The Operation Plan shall be revised when operational procedures change. The Plan shall be revised to reflect any facility alterations performed or to reflect experience resulting from facility operation. Golden Peanut Company LLC will periodically review and revise the operating protocol, as appropriate, to ensure satisfactory system performance.

Abnormal Events

In the event Golden Peanut Company LLC is temporarily unable to comply with any of the conditions of their DEP permit due to breakdown of equipment, power outages, destruction by hazard of fire, wind, or other cause, they will notify DEP. Notification shall be made in person, by telephone, or by other means within 24 hours of breakdown or malfunction to the Pensacola office of Florida Department of Environmental Protection. Phone number (850) 595-8364, extension 1220, day or night.

A written report of any noncompliance referenced above shall be submitted to the Pensacola office of DEP (160 Governmental Center, Pensacola, FL 32501-5794) within 30 days after its occurrence. The report shall describe the nature and cause of the breakdown or malfunction, steps being taken or planned to be taken to correct the problem and prevent its reoccurrence, emergency procedures in use pending correction of problem and the time when facility will again be operating in accordance with permit conditions.

If an emergency arises or there is any condition, which prevents the continued operation of the emission control components or results in non-compliance with applicable regulations, the operator will:

Stop production immediately

Notify main office

Ensure that the emission control components are in good working order before resuming production.

Forms

**Golden Peanut Company LLC
Greenwood, FL**

Weekly Records of Production and Fuel Usage

Year _____

Week ending _____ **By** _____

Peanuts offloaded: _____ **tons**

Peanuts onloaded: _____ **tons**

Peanuts dried: _____ **tons**

Peanuts cleaned: _____ **tons**

Peanuts transferred: _____ **tons**

Fuel purchased: _____ **gallons**

**Golden Peanut Company LLC
Greenwood, FL**

Yearly Records of Production and Fuel Usage

Year _____ **By** _____

Peanuts offloaded: _____ **tons**

Peanuts onloaded: _____ **tons**

Peanuts dried: _____ **tons**

Peanuts cleaned: _____ **tons**

Peanuts transferred: _____ **tons**

Fuel purchased: _____ **gallons**

**Golden Peanut Company LLC
Greenwood, FL**

**Weekly Inspection Record of Air Emissions to be conducted
while plant is operating**

Date _____ **By** _____

Describe emissions as: none, light, medium or heavy

Cyclone #3 outlet _____

Cyclone #4 outlet _____

Cyclone #7 outlet _____

Cyclone #8 outlet _____

Cleaner trash chute _____

Cyclone #3 trash chute _____

Cyclone #4 trash chute _____

Cyclone #7 trash chute _____

Cyclone #8 trash chute _____

Transfer outlet chute _____

**Golden Peanut Company LLC
Greenwood, FL**

**Monthly Inspection Record of Fugitive Air Emissions to be
conducted while plant is operating**

Date _____ **By** _____

Describe emissions as: none, light, medium or heavy

Cleaning station inlet pit _____

Cleaning station dust house _____

Cleaning station dirt bin _____

Cleaning station general area _____

Transfer station dust house _____

Transfer station general area _____

Plant property in general:

**Describe if fugitive emissions are present and location. If no emissions
are present, write none**

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Yearly Site Inspection (prior to processing season)

Condition of cleaning station:

	<u>Poor</u>	<u>Fair</u>	<u>Good</u>	<u>Excellent</u>
Cyclone #7				
Cyclone #8				
Cleaner				
Bucket elevator				
Inlet pit				
Dust house				
Trash bucket elevator				
Cyclone #7 trash chute				
Cyclone #8 trash chute				
Blowpipes and ductwork				
Trash chute				
Cleanliness of area in and around cleaning station				

Condition of transfer station:

	<u>Poor</u>	<u>Fair</u>	<u>Good</u>	<u>Excellent</u>
Cyclone #7				
Cyclone #3				
Cyclone #4				
Receiving tank				
Dust house				
Product transfer chute				
Cyclone #3 trash chute				
Cyclone #4 trash chute				
Blowpipes/ductwork carrying products				
Cleanliness of area in and around cleaning station				

Yearly Site Inspection (prior to processing season) continued

Condition of drying facility:

	Poor	Fair	Good	Excellent
Blower(s)				
Burner(s)				
Hot air plenum				
Individual fabric connectors supplying hot air to wagons				
Cleanliness of area in and around drying facility				

Condition of Remaining Plant facility:

	Poor	Fair	Good	Excellent
Roads				
Debris accumulation throughout facility				
Speed signs posted and visible				

**Golden Peanut Company LLC
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Maintenance Record

**Log of work performed on cyclones, exhaust air ductwork and
blowpipes handling peanuts.**

Date Description of Work