



Florida Department of Environmental Protection

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13051 North Telecom Parkway, Suite 101
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Noah Valenstein
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PERMITTEE

Peace Valley Products
P.O. Box 91
Bartow, Florida and 33830

Air Permit No. 1050454-004-AC
Permit Expires: 6/30/2018
Minor Air Construction Permit

Authorized Representative:
Christopher B. Cook, Vice President

Peace Valley Products
Project: Facility Relocation and
Production Increase

PROJECT

This is the final air construction permit, which authorizes the relocation and production increase of Peace Valley Products facility. The proposed work will be conducted at the Peace Valley Products new location, which is an off-spec fertilizer recycling facility categorized under Standard Industrial Classification No. 2875. The facility will be located in Polk County at 3225 Highway 630 West in Fort Meade, Florida. The UTM coordinates are Zone 17, 415.9 km East and 3069.2 km North.

This final permit is organized into the following sections: Section 1 (General Information); Section 2 (Administrative Requirements); Section 3 (Emissions Unit Specific Conditions); and Section 4 (Appendices). Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 of this permit. As noted in the Final Determination provided with this final permit, only minor changes and clarifications were made to the draft permit.

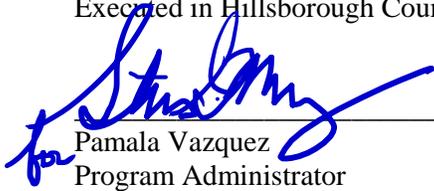
STATEMENT OF BASIS

This air pollution construction permit is issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to conduct the proposed work in accordance with the conditions of this permit. This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Upon issuance of this final permit, any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel (Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000) 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 must be filed within 30 days after this order is filed with the clerk of the Department.

FINAL PERMIT

Executed in Hillsborough County, Florida



Pamala Vazquez
Program Administrator
Permitting & Waste Cleanup Program
Southwest District

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Air Permit package was sent by electronic mail, or a link to these documents made available electronically on a publicly accessible server, with received receipt requested before the close of business on the date indicated below to the following persons.

Christopher B. Cook, Peace Valley Products, ccook@peacevalleyprod.com
W. H. Cook Jr., P.E, WHC Enterprises, LLC, bcook@peacevalleyprod.com
Jim Estler, Clean Air Consulting, Inc., estlerj@aol.com
Scott Borderieux, Florida DEP Southwest District, scott.borderieux@dep.state.fl.us
Danielle Henry, Florida DEP Southwest District, danielle.henry@dep.state.fl.us

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.



August 10, 2017

(Clerk)

(Date)

SECTION 1. GENERAL INFORMATION (FINAL)

FACILITY DESCRIPTION

This facility is an off-spec fertilizer recycling facility. The process includes drying, screening, grinding and conveying of the raw materials to produce final products which includes semi-granular and granular phosphate products. The semi-granular product is sold to the NPK industry as feed stock and the granular product is sold as granular fertilizer in the retail market. This facility is a natural minor source of particulate matter (PM).

The existing facility consists of the following emissions units.

Facility ID No. 1050454	
ID No.	Emission Unit Description
001	Off-Spec Fertilizer Recycling Operation

PROPOSED PROJECT

This project is for the facility relocation and increase in production of an off-spec fertilizer recycling facility. The existing facility is currently located at 800 Pembroke Road in Fort Meade, Florida. This project will relocate the facility’s existing equipment from the existing location to the new warehouse location at 3225 Highway 630 West in Fort Meade, Florida. This project will increase in maximum raw material throughput from 50,000 TPY to 87,600 TPY.

This project will modify the following emissions units.

Facility ID No. 1050454	
ID No.	Emission Unit Description
001	Off-Spec Fertilizer Recycling Operation

EXEMPT EMISSION SOURCES/ACTIVITIES

- Volatile organic compounds (VOC) and hazardous air pollutant (HAP) emissions from the 5,000-gallon storage tank used to store and apply de-dusting agent to the fertilizer product in production and shipping are exempt pursuant to Rule 62-210.300(3)(b)1., F.A.C. The operation will potentially consume up to 200,000 pounds per year of undiluted de-dusting agent. (Generic Emissions Unit or Activity Exemption).

Note: The de-dusting agent used contains some VOC; however, the undiluted de-dusting agent consist of a hydrotreated naphthenic petroleum distillate similar to motor oil. Because motor oil has a low vapor pressure, the VOC emissions from the system are negligible. It should not evaporate and will be retained on the product. .

- Particulate matter (PM) emissions from the power screening of gypsum, dolomite and recycled sulfur are exempt pursuant to Rule 62-210.300(3)(b)1., F.A.C. (Generic Emissions Unit or Activity Exemption).

Note: The screened materials will have moisture content ranging from 4 to 8 percent.

FACILITY REGULATORY CLASSIFICATION

- The facility is not a major source of hazardous air pollutants (HAP).
- The facility does not operate units subject to the acid rain provisions of the Clean Air Act (CAA).
- The facility is not a Title V major source of air pollution in accordance with Chapter 62-213, F.A.C.
- The facility/is not a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.
- This facility is a natural minor source of air pollution.

SECTION 1. GENERAL INFORMATION (FINAL)

PERMIT HISTORY/AFFECTED PERMITS

This permit replaces Construction Permit No. 1050454-001-AC;

SECTION 2. ADMINISTRATIVE REQUIREMENTS (FINAL)

1. Permitting Authority: The permitting authority for this project is the Southwest District of the Department of Environmental Protection (Department). The mailing address, phone number and e-mail address is:

Florida Department of Environmental Protection
Southwest District Office
Air and Solid Waste Permitting Program
13051 North Telecom Parkway, Suite 101
Temple Terrace, Florida 33637-0926
Telephone: 813-470-5700
E-mail: SWD_Air_Permitting@dep.state.fl.us

All documents related to applications for permits shall be submitted to the above e-mail address and/or address.

2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Florida Department of Environmental Protection (Department), Southwest District Office's Compliance Assurance Program. The mailing address, phone number and e-mail address is:

Florida Department of Environmental Protection
Southwest District Office
Compliance Assurance Program
13051 North Telecom Parkway, Suite 101
Temple Terrace, Florida 33637-0926
Telephone: 813-470-5700
E-mail: SWD_Air@dep.state.fl.us

3. Appendices: The following Appendices are attached as a part of this permit:
 - Appendix A (Citation Formats and Glossary of Common Terms);
 - Appendix B (General Conditions);
 - Appendix C (Common Conditions); and
 - Appendix D (Common Testing Requirements).
4. Applicable Regulations, Forms and Application Procedures: Unless otherwise specified in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.
5. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time.
[Rule 62-4.080, F.A.C.]
6. Modifications: The permittee shall notify the Compliance Authority upon commencement of construction. No new emissions unit shall be constructed and no existing emissions unit shall be

SECTION 2. ADMINISTRATIVE REQUIREMENTS (FINAL)

modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification.

[Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]

7. Construction and Expiration. The expiration date shown on the first page of this permit provides time to complete the physical construction activities authorized by this permit, complete any necessary compliance testing, and obtain an operation permit. Notwithstanding this expiration date, all specific emissions limitations and operating requirements established by this permit shall remain in effect until the facility or emissions unit is permanently shut down. For good cause, the permittee may request that that a permit be extended. Pursuant to Rule 62-4.080(3), F.A.C., such a request shall be submitted to the Permitting Authority in writing before the permit expires.
[Rules 62-4.070(4), 62-4.080 & 62-210.300(1), F.A.C.]

8. Application for Non-Title V Air Operation Permit: This permit authorizes modification of the permitted emissions unit(s) and initial operation to determine compliance with Department rules. A Non-Title V air operation permit is required for continued operation of the permitted emissions unit(s). The permittee shall apply for a Non-Title V air operation permit at least 90 days prior to expiration of this permit, but no later than 180 days after commencing operation or commencing operation as modified. Commencing operation means setting into operation of any emissions unit for any purpose. To apply for a Non-Title V air operation permit, the applicant shall submit the following:
 - a. the appropriate permit application form (*see current version of Rule 62-210.900, F.A.C. (Forms and Instructions)*), and/or *FDEP Division of Air Resource Management website at: <http://www.dep.state.fl.us/air/>*);
 - b. the appropriate operation permit application fee from Rule 62-4.050(4)(a), F.A.C.; (applies to non-Title V facilities and construction permits at a Title V facility that does not have an effective Title V permit)
 - c. copies of the most recent month of records/logs specified in Specific Condition No(s). A.9.The application shall be submitted to the Permitting Authority.

[Rules 62-4.030, 62-4.050 and Chapter 62-213, F.A.C.]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS (FINAL)

A. EU No. 001 – Off-Spec Fertilizer Recycling Operation

This section of the permit addresses the following emissions unit.

EU No.	Emission Unit Description
001	<p><u>Off-Spec Fertilizer Recycling Operation</u> The fertilizer recycling operation consists of two separate systems which includes the Dryer System, and the Shipping System. The systems are described below.</p> <ol style="list-style-type: none"> 1. <u>Dryer System</u> – This system dries raw feed materials and screens it into two grades; semi-granular, granular. Damp raw material with a moisture content between five and seven percent is fed to the dryer feed conveyor (via a front-end loader and Feed Hopper #1) which discharges into a granulator which feeds the dryer. The dryer is a 54-inch diameter by 33 feet long standard rotary dryer that operates with co-current airflow. The dryer is fired with propane and has a design heat input rate of 3 million Btu per hour. <ol style="list-style-type: none"> a. The air stream from the dryer is vented through a cyclone and then through a venturi scrubber system which discharges to the atmosphere from a stack 25 feet tall and 20 inches at the exit diameter. b. Dry material from the dryer is discharged onto a conveyor, into the dryer discharge elevator and then to the Rotex Screen. The Rotex Screen is an enclosed system that separates the material into three streams. <ol style="list-style-type: none"> i. The semi granular will be transferred directly into an enclosed bin. ii. The granular will be de-dusted in a ribbon mixer and transferred to storage through a conveyor system. iii. The oversize material will be transferred to a grinding circuit. The grinding circuit consists of a chain mill that is enclosed the discharge is feed back into the dryer discharge elevator and becomes one of the other two grades c. Fugitive emissions from the screen, the transfer points from the dryer discharge and the grinding circuit are vented through a clean air combustion air system vented through a baghouse (Baghouse #1) and then transferred into the dryer combustion chamber for quench air. Quench air is required to control inlet gas temperature as well as supplying the volume of air to remove moisture from the dried product. 2. <u>Shipping System</u>– This system is used to loads final products into trucks for shipping. The system consists of a hopper (Feed Hopper #2), a feed conveyor, an enclosed oversize screen, a loadout conveyor, an enclosed ribbon mixer (used for applying a de-dusting agent) and a discharge conveyor to discharging final products into trucks. Fugitive emissions from the feed hopper, oversize screen, loadout conveyor and ribbon mixer are vented through a baghouse (Baghouse #2) which discharges into the enclosed warehouse. <p><i>The permit application dated June 20, 2017 includes a process flow diagram of the operation described above</i></p> <p><i>Notes:</i> ^[1]<i>The cyclone is considered process equipment not pollution control equipment.</i> ^[2]<i>Baghouse #1 discharges back into the quench air system for the dryer. Baghouse #2 discharges into an enclose building. Both baghouses are therefore exempt from permitting since they are in and discharge into an enclosed building.</i></p>

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS (FINAL)

A. EU No. 001 – Off-Spec Fertilizer Recycling Operation

EQUIPMENT

- A.1. Off-Spec Fertilizer Recycling Operation: The permittee is authorized to relocate and install their existing Off-spec Fertilizer Recycling Operation at the new location on 3225 Highway 630 West in Fort Meade, Florida.

PERFORMANCE RESTRICTIONS

- A.2. Permitted Capacity: This emission units is limited to a maximum allowable throughput rate of 87,600 tons per any consecutive 12 month period.
[Rule 62-210.200(PTE), F.A.C.]
- A.3. Restricted Operation: The hours of operation are not limited (8760 hours per year).
[Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]

EMISSIONS STANDARDS

- A.4. Emissions Standards: No person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity equal to or greater than 20% opacity. This regulation does not impose a specific testing requirement.
[Rule 62-296.320(4)(b)1, F.A.C.]
- A.5. Unconfined Particulate Emissions - No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any activity, including vehicular movement; transportation of materials; construction, alteration, demolition or wrecking; or industrially related activities such as loading, unloading, storing or handling; without taking reasonable precautions to prevent such emissions. Reasonable precautions shall include the following:
- a. Paving and maintenance of roads, parking areas and yard.
 - b. Application of water or chemicals to control emissions from such activities as demolition of buildings, grading roads, construction, pipe flattening and land clearing.
 - c. Application of asphalt, water, oil, chemicals or other dust suppressants to unpaved roads, yard, open stock piles an similar activities.
 - d. Removal of particulate matter from roads and other paved areas under the control of the owner or operator of the facility to prevent reentrainment, and from buildings or work areas to prevent particulate from becoming airborne.
 - e. Landscaping or planting vegetation.
 - f. Use of hoods fans, filters and similar equipment to contain, capture and/or vent particulate matter.
- [Rule 62-296.320(4)(c), F.A.C.; Permit Application 1050454-004-AC]
- A.6. Reasonable Precautions to Prevent VOC and Organic Solvent (OS) Emissions - The permittee shall not store, pump, handle process, load, unload, or use in any process or installation, VOC or OS's without applying know and existing vapor emission control devices or systems deemed necessary by the Department. Reasonable precautions and/or controls shall include the following:
- a. Tightly covering or closing all de-dusting agent containers when not in use.
 - b. Immediately confine and clean up any spill; make sure waste are placed in closed containers for reuse, recycle or proper disposal.

[Rule 62-296.320(1), F.A.C. ; Permit Application 1050454-004-AC]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS (FINAL)

A. EU No. 001 – Off-Spec Fertilizer Recycling Operation

EMISSIONS AND CONTROLS

- A.7. Circumvention - The permittee shall not circumvent the air pollution control equipment (i.e. the dryer system venturi scrubber) or allow the emission of air pollutants without this equipment operating properly.
[Rule 62-210.650, F.A.C.]

NOTIFICATION REQUIREMENTS

- A.8. Notification of Operation Commencement: The permittee shall notify the Compliance Authority in writing of the date of commencing operation of the EU No. 001 after completing the modifications authorized by this permit, no later than fifteen (15) days after that date. Commencing operation means setting into operation of any emissions unit for any purpose.
[Rules 62-4.070, and 62-210.200, F.A.C., (definition of Commence Operation)]

RECORDS AND REPORTS

- A.9. Monthly Throughput Records - To demonstrate compliance with the throughput limits of Specific Condition No. A.1., the permittee shall keep the following records:

- a. Facility Name, Facility Number (1050454), Emission Unit No. (001), Month, Year;
- b. The total quantity of off-spec fertilizer fed to the dryer (in tons) for the month;
The total quantity of off-spec fertilizer fed to the dryer (in tons) for the most recent consecutive 12-month period.

Monthly records shall be completed by the end of following month and shall be maintained as required by the records retention requirements of Appendix C.

[Rule 62-4.070(3), F.A.C.]