



# Florida Department of Environmental Protection

Northeast District  
7825 Baymeadows Way, Suite B200  
Jacksonville, Florida 32256-7590

Rick Scott  
Governor

Jennifer Carroll  
Lt. Governor

Herschel T. Vinyard Jr.  
Secretary

June 14, 2012

Mr. Timmy Garris  
District Manager  
Griffin Industries, LLC  
1011 Orient Road  
Tampa, Florida 33619-3321

Re: Title V Air Operation Permit Revision  
PROPOSED Permit Project No.: 0070004-018-AV  
Revision to Title V Air Operation Permit No.: 0070004-014-AV  
Griffin Industries, LLC

Dear Mr. Garris:

One copy of the "PROPOSED Determination" for the Title V Air Operation Permit Revision for Griffin Industries, LLC Hampton Facility located at 11313 SE 52nd Ave, Starke, Florida, Bradford County, is enclosed. This letter is only a courtesy to inform you that the DRAFT Permit has become a PROPOSED Permit.

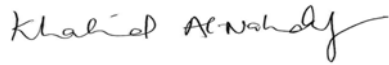
An electronic version of this determination has been posted on the Division of Air Resources Management's world wide web site for the United States Environmental Protection Agency (USEPA) Region 4 office's review. The web site address is:

["http://www.dep.state.fl.us/air/eproducts/ards/default.asp"](http://www.dep.state.fl.us/air/eproducts/ards/default.asp)

Pursuant to Section 403.0872(6), Florida Statutes, if no objection to the PROPOSED Permit is made by the USEPA within 45 days, the PROPOSED Permit will become a FINAL Permit no later than 55 days after the date on which the PROPOSED Permit was mailed (posted) to USEPA. If USEPA has an objection to the PROPOSED Permit, the FINAL Permit will not be issued until the permitting authority receives written notice that the objection is resolved or withdrawn.

If you should have any questions, please contact Yasmin K. Enriquez at 904/256-1570.

Sincerely,



Khalid AlNahdy, P.E.  
District Air Program Administrator

KAA: yke

Enclosures

copy furnished to:

Mr. Michael Schmidt Environmental Manager Griffin Industries, LLC [mschmidt@griffinind.com](mailto:mschmidt@griffinind.com)

Mr. Timmy Garris, District Manager Griffin Industries, LLC [tgarris@griffinind.com](mailto:tgarris@griffinind.com)

Mr. Brad James, P.E., Trinity Consultants [BJAMES@Trinityconsultants.com](mailto:BJAMES@Trinityconsultants.com)

Ms. Katy Forney, U.S. EPA Region 4: [forney.kathleen@epamail.epa.gov](mailto:forney.kathleen@epamail.epa.gov)

Ms. Ana Oquendo, EPA Region 4: [oquendo.ana@epamail.epa.gov](mailto:oquendo.ana@epamail.epa.gov)

Ms. Barbara Friday, [barbara.friday@dep.state.fl.us](mailto:barbara.friday@dep.state.fl.us) (for posting with Region 4 , U.S. EPA)

## **PROPOSED Determination**

Title V Air Operation Permit Revision

PROPOSED Permit Project No.: 0070004-018-AV

Revision to Title V Air Operation Permit No.: 0070004-014-AV

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### **I. Public Notice.**

An “INTENT TO ISSUE TITLE V AIR OPERATION PERMIT REVISION” to Mr. Timmy Garris Griffin Industries, LLC for the Hampton Facility located at 11313 SE 52nd Ave, Starke, Florida Bradford County was clerked on March 27, 2012. The “PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT REVISION” was published in the Florida Times Union on April 26, 2012. The DRAFT Permit was available for public inspection at the Northeast District Office in Jacksonville . Proof of publication of the “PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT REVISION” was received on May 03, 2012.

### **II. Public Comment(s).**

Comments were received and the DRAFT Permit was changed. The comments were not considered significant enough to reissue the DRAFT Permit and require another Public Notice. Comments were received from 1 respondent during the 30 (thirty) day public comment period. Listed below is a response to each comment in the order that the comments were received. The comment(s) will not be restated

Email Correspondence from Mr.Mike Schmidt received on May 29, 2012.

- 1. Response:** The company name has been corrected, as requested, to Griffin Industries LLC throughout all permit documents.
- 2. Response:** Please note that this condition was established in Construction Permit Nos. 0070004-009-AC, 0070004-010-AC, and 0070004-012-AC. Because it was established in an air construction permit, the condition is federally enforceable. The construction permits will be cited as the basis of the permit condition. Facilitywide Condition FW 3 remains the same.
- 3. Response:** The Air Construction Permit number has been corrected to read, “ No. 0070004-015-AC”.

4. **Response:** Specific Condition A.7 remains the same. As a result of this comment  
Specific Condition No A. 10 is hereby changed:

**From:** On-specification Used Oil: The burning of “on-specification” used oil is allowed at this facility in accordance with all other conditions of this permit and the following additional conditions:

“On-specification” used oil is defined as that meets the 40 CFR 279 (Standards for the Management of Used Oil) specifications listed below.

<i>On-Spec Used Oil Specifications</i>	
Pollutant	Allowable Level
Arsenic	5 ppm maximum
Cadmium	2 ppm maximum
Chromium	10 ppm maximum
Lead	100 ppm maximum
Total Halogens	1,000 ppm maximum
Flash Point	100°F minimum
PCBs	See Condition A.11.

The facility shall demonstrate compliance with the on-specification used oil specification by using approved EPA, DEP, or ASTM test methods or a certified on-specification used oil analysis. For used oil generated on site, the compliance demonstration is required upon Department’s request. For the used oil purchased from the fuel supplier, the facility shall demonstrate compliance using the certification from the supplier. Documentations shall be maintained on site to show that it meets the standards.

Also, the sulfur content of the used oil is limited to 0.5 %, by weight.

[Rules 62-4.070(3), F.A.C., Permit No. 0070004-015-AC, and Permit No. 0070004-016-AC]

**To:** On-specification Used Oil: The burning of “on-specification” used oil is allowed at this facility in accordance with all other conditions of this permit and the following additional conditions:

“On-specification” used oil is defined as that meets the 40 CFR 279 (Standards for the Management of Used Oil) specifications listed below.

<u>On-Spec Used Oil Specifications</u>	
Pollutant	Allowable Level
Arsenic	5 ppm maximum
Cadmium	2 ppm maximum
Chromium	10 ppm maximum
Lead	100 ppm maximum
Total Halogens	1,000 ppm maximum
Flash Point	100°F minimum
PCBs	See Condition A.11.

The facility shall demonstrate compliance with the on-specification used oil specification by using approved EPA, DEP, or ASTM test methods or a certified on-specification used oil analysis. For used oil generated on site, the compliance demonstration is required upon Department's request. For the used oil purchased from the fuel supplier, the facility shall demonstrate compliance using the certification from the supplier. Documentations shall be maintained on site to show that it meets the standards.

Also, the sulfur content of the used oil fired in EUs 006, 007, and 008 is limited to 0.5 %, by weight. The sulfur content of the used oil fired in EU 017 is limited to 0.05%, by weight.

[Rules 62-4.070(3), F.A.C., Permit No. 0070004-015-AC, and Permit No. 0070004-016-AC]

5. **Response:** Specific Condition No. B 5 remains the same.
6. **Response:** As a result of this comment Specific Condition No B.8(3) was correctly referenced.
7. **Response:** As a result of this comment Specific Condition No B.10. was correctly referenced.
8. **Response:** As a result of this comment Table 1 was correctly referenced.
9. **Response:** As a result of this comment Specific Condition B. 18. has been changed:

**From:** Use Equation 3 as described below to determine the actual solvent loss occurring from the unit for all normal operating periods recorded within a calendar month. Equation 1 of this section follows:

$$\text{Monthly Actual Solvent (gal)} = \sum_{i=1}^n (\text{SOLV}_B - \text{SOLV}_E + \text{SOLV}_R \pm \text{SOLV}_A)_i \quad (\text{Eq. 3})$$

**To:** Use Equation 3 as described below to determine the actual solvent loss occurring from the unit for all normal operating periods recorded within a calendar month. Equation 3 of this section follows:

$$\text{Monthly Actual Solvent loss (gal)} = \sum_{i=1}^n (\text{SOLV}_B - \text{SOLV}_E + \text{SOLV}_R \pm \text{SOLV}_A)_i \quad (\text{Eq. 3})$$

**10. Response:** As a result of this comment Specific Condition No C.12. was correctly referenced.

### **III. Conclusion.**

The permitting authority hereby issues the PROPOSED Permit, with any changes noted above.