Florida Department of Environmental Protection

Northeast District
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Jacksonville, Florida 32256

Rick Scott
Governor

Carlos Lopez-Cantera
Lt. Governor

Jonathan P. Steverson
Secretary

NOTICE OF ADMINISTRATIVELY CORRECTED TITLE V AIR OPERATION PERMIT

In the Matter of a Request for Administrative Correction:

Mr. Timmy Garris, District Manager
Griffin Industries, LLC
1001 Orient Road
Tampa, Florida 33619

Project No. 0070004-026-AV

Administrative Correction to:
Permit No. 0070004-023-AV

Bradford County

Enclosed is an administratively corrected page to Title V Air Operation Permit No. 0070004-023-AV for the operation of the Hampton Facility located in Bradford County at 11313 S.E. 52nd Avenue, Starke, Florida.

This correction is issued pursuant to Rule 62-210.360, Florida Administrative Code (F.A.C.), and Chapter 403, Florida Statutes (F.S.). This change is made at the applicant's request received August 4, 2015, to correct Title V Operation Permit No. 0070004-023-AV to reflect the applicant requested administrative changes to the Draft/Proposed version of the Title V Operation submitted to the Department of Environmental Protection (Department) on November 7, 2014, that could not be incorporated into the Final Title V Operation Permit at the time of permit issuance. Pursuant to Rule 62-210.360(1)(g), F.A.C., the permit is being corrected to reflect that existing Emissions Units 017 is not equipped with an oxygen trim system, reference biennial tune-ups instead of tune-ups every five years, and reference biennial compliance reports instead of compliance reports every five years. The requirements for biennial tune-ups and compliance reports are more stringent that the permit allowed. This corrective action does not alter the effective dates of the existing permit.

The Department will consider the above-noted action final unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57, F.S. Mediation under Section 120.573, F.S., will not be available for this proposed action.

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. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions must be filed within 14 days of receipt of this administratively corrected permit. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. 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, and telephone number of the petitioner; the name, address and telephone 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 state; (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 statutesthe 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. 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.

Judicial Review: Any party to this permitting decision (order) has the right to seek judicial review of it under Section 120.68, F.S., 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, 3900 Commonwealth Boulevard, MS 35, 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.

Executed in Jacksonville, Florida.

Richard S Rachal III

Richard S. Rachal III, P.G.
Permitting Program Administrator

FILING AND ACKNOWLEDGEMENT & CERTIFICATE OF SERVICE

Filed on this date pursuant to § 120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged. The undersigned hereby certifies that this NOTICE OF ADMINISTRATIVELY CORRECTED TITLE V AIR OPERATION PERMIT and all copies were sent before the close of business on October 1, 2015 to the listed persons.

Timmy Garris, District Manager, Griffin Industries (tgarris@griffinind.com)
Brad James, P.E., Managing Consultant, Trinity Consultants (bjames@trinityconsultants.com)
Ms. Ana Oquendo, EPA Region 4 (oquendo.ana@epa.gov)
Ms. Natasha Hazziez, EPA Region 4 (hazziez.natasha@epa.gov)

Clerk

October 1, 2015
Date

Pursuant to the Request received August 4, 2015, Title V Operation Permit No. 0070004-023-AV is corrected as indicated below. The following permit condition is revised as indicated. ~~Strikethrough~~ is used to denote the deletion of text, Double-underlines are used to denote the addition of text. All changes are emphasized with shading.

1. On Page 8 of 138, Section III, Subsection A, EU017 Brief Description, Griffin requests that the statement, "*The boiler is equipped with an oxygen trim system"* be removed. According to 40 CFR 63.7575, an oxygen trim system is defined as *"a system of monitors that is used to maintain excess air at the desired level in a combustion device. A typical system consists of a flue gas oxygen and/or CO monitor that automatically provides a feedback signal to the combustion air controller."* After further review and clarification, Griffin does not believe that the facility's current mechanical linkage system of adjusting combustion air for this emission unit meets the EPA definition of an "oxygen trim system".

   Page 8 of 138, Section III, Subsection A, EU017 Brief Description, is hereby changed in the Permit as follows:

017	*Description*: No. 4 Boiler is a 9.9 MMBtu/hour capacity boiler that solely provides energy for SPN solvent extraction process. *Fuels:* This unit is authorized to fire natural gas, No. 2 fuel oil with a maximum sulfur content of 0.05% by weight; on-specification used oil with a maximum sulfur content of 0.05% by weight, Ultra Low Sulfur Diesel (ULSD), and processed grease. *Stack Parameters:* Exhaust gas exists at approximately 375 °F with a volumetric flow rate of 1,909 scfm through a single stack that is approximately 2 feet in diameter and 15 feet above ground level. ~~*The boiler is equipped with an oxygen trim system.*~~

2. On page 11 of 138, Section III. Subsection A, Permit Condition A.11, On-Spec Used Oil Specifications Table, Griffin believes that the *"See Condition A.11."* reference for PCBs is incorrect and should be revised to *"See Condition A.12."*

   Page 11 of 138, Section III, Subsection A, Permit Condition A.11., is hereby changed in the Permit as follows:

   A.11. 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.

On-Spec Used Oil Specifications	
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~~12.

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 Nos. 0070004-015-AC and 0070004-022-AC, and Permit No. 0070004-016-AC]

3. On page 12 of 138, Section III. Subsection A, Griffin believes that Permit Conditions A.13 and A.15 should be corrected to reference biennial tune-ups for EU017 instead of tune-ups every five years. As denoted above, EU017 does not utilize an oxygen trim system that meets the definition prescribed in NESHAP Subpart DDDDD. According to Table 3. No. 2 of NESHAP Subpart DDDDD (work practice standards), a new boiler without an oxygen trim system shall conduct biennial tune-ups. Therefore, Griffin is requesting that the regulatory reference for Permit Condition be updated to *"Table 3 No. 2"* instead of *"Table 3 No. 1"*.

Page 12 of 138, Section III, Subsection A, Permit Condition A.13., is hereby changed in the Permit as follows:

A.13. Tune-Up of Boiler – EU 017. The applicable work practice standards of Table 3 to 40 CFR 63 Subpart DDDDD must be met. A tune-up of the boiler shall be conducted ~~every 5 years~~ biennially as specified in Condition A.15. This requirement applies at all times the boiler is operating and also during periods of startup and shutdown.

a. *Initial Tune-up*: The first ~~5-year~~ biennial tune-up shall be no later than January 31, 201~~8~~5.

b. *Subsequent Tune-ups*: Thereafter, performance tune-ups shall be conducted on a ~~5~~2-year basis as specified in Condition A.15. Each ~~5-year~~ biennial tune-up shall be conducted no more than ~~61~~25 months after the previous tune-up.

[40 CFR 63.7500(a)(1), Table 3 No. ~~1~~2., 40 CFR 63.7500(e), 40 CFR 63.7500(f), 40 CFR 63.7505(a), 40 CFR 63.7510(g), 40 CFR 63.7515(d)]

Page 12 of 138, Section III, Subsection A, Permit Condition A.15., is hereby changed in the Permit as follows:

A.15. Continuous Compliance Demonstration – EU 017. A tune-up of the boiler as specified in the below paragraphs shall be conducted every ~~5 years~~ biennially to demonstrate continuous compliance. ~~The burner inspection specified in paragraph (a)(10)(i) of 40 CFR 63.7540 may be delayed until the next scheduled or unscheduled unit shutdown, but each burner must be inspected at least once every 72 months.~~

(i) As applicable, inspect the burner, and clean or replace any components of the burner as necessary (you may delay the burner inspection until the next scheduled unit shutdown). At units where entry into a piece of process equipment or into a storage vessel is required to complete the tune-up inspections, inspections are required only during planned entries into the storage vessel or process equipment;

(ii) Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available;

(iii) Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (you may delay the inspection until the next scheduled unit shutdown);

(iv) Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, if available, and with any NO_X requirement to which the unit is subject;

(v) Measure the concentrations in the effluent stream of CO in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer; and

(vi) Maintain on-site and submit, if requested by the Administrator, an annual report containing the information in paragraphs (vi)(A) through (C) of this Condition,

(A) The concentrations of CO in the effluent stream in parts per million by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler or process heater;

(B) A description of any corrective actions taken as a part of the tune-up; and

(C) The type and amount of fuel used over the 12 months prior to the tune-up, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel used by each unit.

[40 CFR 63.7540(a), 40 CFR 63.7540(a)(10)(i)-(vi), 40 CFR 63.7540(a)(~~12~~11)]

4. On page 20 of 138, Section III. Subsection A, Griffin requests that Permit Condition A.36 be updated. Permit Condition A.35 states, *"You may submit only a biennial compliance report as specified in paragraphs (1) through (4) of Condition A.36., instead of a semi-annual compliance report."* However, paragraphs (1) through (4) of Permit Condition A.36 reference five-year compliance reports due to the aforementioned assertion of an oxygen trim system. Griffin believes that Permit Conditions A.36(1-4) should be corrected to reference biennial compliance reports. In addition, Permit Condition A.36.(3) should be changed to "cover the 2 year periods from January 1 to December 31.", and Permit Condition A.36.(5)(v) should be changed to reflect a biennial tune up in accordance with §63.7540(a)(11).

Page 20 of 138, Section III, Subsection A, Permit Condition A.36., is hereby changed in the Permit as follows:

A.36. Compliance Reports- EU 017.

(1) The first compliance report must cover the period beginning on the compliance date that is specified for the boiler in §63.7495 ~~(startup of the boiler)~~ and ending on July 31 or January 31, whichever date is the first date that occurs at least 180 days (or ~~5~~ 2 years ~~(~~if submitting an biennial ~~5-year~~ compliance report) after the compliance date that is specified for your source in ~~§~~ 40 CFR 63.7495.

(2) The first compliance report must be postmarked or submitted no later than July 31 or January 31, whichever date is the first date following the end of the first calendar half after the compliance date that is specified for each boiler or process heater in 40 CFR 63.7495. The first ~~5-year~~ biennial compliance report must be postmarked or submitted no later than January 31.

(3) Each subsequent compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31. Each subsequent biennial ~~5-year~~ compliance report must cover the 2 ~~5~~-year periods from January 1 to December 31.

(4) Each subsequent compliance report must be postmarked or submitted no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period. Each subsequent biennial ~~5 year~~ compliance report must be postmarked or submitted no later than January 31.

(5) *Tune Ups*. The compliance report must be submitted with the information in paragraphs (5)(i) through (v) of this Condition.

(i) Company and Facility name and address.

(ii) Process unit information, emissions limitations, and operating parameter limitations.

(iii) Date of report and beginning and ending dates of the reporting period.

(iv) The total operating time during the reporting period.

(v) Include the date of the most recent tune-up for each unit subject to only the requirement to conduct an biennial ~~5 year~~ tune-up according to §63.7540(a)(~~12~~11). Include the date of the most recent burner inspection if it was not done biennially ~~on a 5 year period~~ and was delayed until the next scheduled or unscheduled unit shutdown.

[40 CFR 63.7550(a),(b), (c)(1), (c)(5)(i)-(iv), (c)(5)(xiv)]

5. On page 20 of 138, Section III. Subsection A, Permit Condition A.36(1), Griffin requests that the statement *"(startup of the boiler)"* be removed. According to 40 CFR 63.7495(a), *"If you have a new or reconstructed boiler or process heater, you must comply with this subpart by January 31, 2013, or upon startup of your boiler or process heater, whichever is later.*" As provided in Griffin's August 12, 2014, email to Ms. Rita Felton-Smith, the initial startup date of EU017 is August 10, 2011. As the compliance date of January 31, 2013 is later than the boiler startup date of August 10, 2011, Griffin requests that the aforementioned comment be removed as the startup of the boiler is not the appropriate compliance date.

   Page 20 of 138, Section III, Subsection A, Permit Condition A.36.(1), is changed in the Permit as requested. Refer to Item 4 above.