State of Georgia
Department of Natural Resources
Environmental Protection Division
Air Protection Branch

Stationary Source Permitting Program
4244 International Parkway, Suite 120
Atlanta, Georgia 30354
404/363-7000
Fax: 404/363-7100

EXPEDITED PERMITTING PROGRAM – APPLICATION FOR ENTRY TO PROGRAM FOR AIR PERMITS

RECEIVED
SEP 07 2017

EPD Use Only

Date Received: _____ Application No. 26-207

To be eligible for expedited review, this application form must be accompanied by the complete permit application for the type of air permit being requested, and a pre-application meeting with EPD must have been conducted.

1. Contact Information

Facility Name: Tifton Peanut Company, LLC - Plants #2 and #3
AIRS No. (if known): 04-13- -
Contact Person: Jake Whiddon Title: Plants Manager
Telephone No.: (229) 382-4655 Alternate Phone No.: _____
Email Address: jake@tiftonpeanut.com

If EPD is unable to contact me, please contact the alternate contact person:

Contact Person: Trent Samples Ben Dravek Title: Consultant (Engineer)
Telephone No.: (770) 844-0037 Alternate Phone No.: _____
Email Address: tsamples@wheeinc.com

On Page 2 of this form, please check the appropriate box for which type of air permit you are requesting expedited review.

I have read the Expedited Review Program Standard Operating Procedures and accept all of the terms and conditions within. I understand that it is my responsibility to ensure an application of the highest quality is submitted and to address any requests for additional information by the deadline specified. I understand that submittal of this request form is not a guarantee that expedited review will be granted.

Signature: Jake Whiddon Date: 9-6-17

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SIP AIR PERMIT APPLICATION

RECEIVED
SEP 07 2017
Air Protection Branch

EPD Use Only

Date Received: _____ Application No. 26207

FORM 1.00: GENERAL INFORMATION

1. Facility Information

Facility Name: Tifton Peanut Company, LLC – Plants #2 and #3

AIRS No. (if known): 04-13- -

Facility Location: Street: 225 Windy Hill Road

City: Tifton Georgia Zip: 31793 County: Tift

Is this facility a "small business" as defined in the instructions? Yes: ☒ No: ☐

2. Facility Coordinates

Latitude: 31° 23' 56" **NORTH** Longitude: 83° 30' 15" **WEST**

UTM Coordinates: 261907 **EAST** 3476519 **NORTH** **ZONE** 17S

3. Facility Owner

Name of Owner: Tifton Peanut Company, Inc.

Owner Address Street: 30 US-319

City: Tifton State: GA Zip: 31793

4. Permitting Contact and Mailing Address

Contact Person: Jake Whiddon Title: Plants Manager

Telephone No.: (229) 382-4655 Ext. _____ Fax No.: _____

Email Address: jake@tiftonpeanut.com

Mailing Address: Same as: Facility Location: ☐ Owner Address: ☐ Other: ☒

If Other: Street Address: P.O. Box 1809

City: Tifton State: GA Zip: 31794

5. Authorized Official

Name: Jake Whiddon Title: Plants Manager

Address of Official Street: 225 Windy Hill Road

City: Tifton State: GA Zip: 31793

This application is submitted in accordance with the provisions of the Georgia Rules for Air Quality Control and, to the best of my knowledge, is complete and correct.

Signature: Jake Whiddon Date: 9-6-17

11. If confidential information is being submitted in this application, were the guidelines followed in the "Procedures for Requesting that Submitted Information be treated as Confidential"?

☐ No ☐ Yes

12. New Facility Emissions Summary

Criteria Pollutant	New Facility	
	Potential (tpy)	Actual (tpy)
Carbon monoxide (CO)		
Nitrogen oxides (NOx)		
Particulate Matter (PM) (filterable only)	67.36	< 67.36
PM <10 microns (PM10)	61.51	< 61.51
PM <2.5 microns (PM2.5)	46.56	< 46.56
Sulfur dioxide (SO_2)		
Volatile Organic Compounds (VOC)		
Greenhouse Gases (GHGs) (in CO2e)		
Total Hazardous Air Pollutants (HAPs)		
Individual HAPs Listed Below:		

13. Existing Facility Emissions Summary

Criteria Pollutant	Current Facility		After Modification	
	Potential (tpy)	Actual (tpy)	Potential (tpy)	Actual (tpy)
Carbon monoxide (CO)				
Nitrogen oxides (NOx)				
Particulate Matter (PM) (filterable only)				
PM <10 microns (PM10)				
PM <2.5 microns (PM2.5)				
Sulfur dioxide (SO_2)				
Volatile Organic Compounds (VOC)				
Greenhouse Gases (GHGs) (in CO2e)				
Total Hazardous Air Pollutants (HAPs)				
Individual HAPs Listed Below:				

19. List requested permit limits including synthetic minor (SM) limits.

Request for coverage under GA Permit By Rule, GA Rule 391-3-1-.03(11)(b)11.

Facility Name: Tifton Peanut Company, LLC – Plants #2 and #3 **Date of Application:** 9/5/2017

FORM 2.06 – MANUFACTURING AND OPERATIONAL DATA

Normal Operating Schedule: 8-16 hours/day 5 days/week ≈ 37 weeks/yr

Additional Data Attached? ☒ - No ☐ - Yes, please include the attachment in list on Form 1.00, Item 16.

Seasonal and/or Peak Operating Periods: Buying Plant operation is typically from September 15th through December 1st, Shelling & Seed Treating operation is from November 1st through May 31st.

Dates of Annually Occurring Shutdowns: Buying Plant shutdown is early December, Shelling & Seed Treating shutdown is May 31st.

PRODUCTION INPUT FACTORS

Emission Unit ID	Emission Unit Name	Const. Date	Input Raw Material(s)	Annual Input	Hourly Process Input Rate		
					Design	Normal	Maximum
REC1	Buying Point Receiving	2017	Farmerstock Peanuts	90,000 Tons	50 TPH	≤ 50 TPH	50 TPH
REC2	Shelling Plant Receiving	2017	Farmerstock Peanuts	40,000 Tons	50 TPH	≤ 50 TPH	50 TPH

PRODUCTS OF MANUFACTURING

Emission Unit ID	Description of Product	Production Schedule		Hourly Production Rate (Give units: e.g. lb/hr, ton/hr)			
		Tons/yr	Hr/yr	Design	Normal	Maximum	Units
LO	Farmerstock Loadout	90,000 (Max)	1,800	≤ 50	≤ 50	50	TPH
-	Bagged Treated Seed Peanuts	40,000 (Max)	< 5,000	8	≤ 8	8	TPH
HL	Hull Loadout	8,400 (Max)	< 5,000	≤ 1.7	≤ 1.7	1.7	TPH

Facility Name: Tifton Peanut Company, LLC – Plants #2 and #3 **Date of Application:** 9/5/2017

Form 3.00 – AIR POLLUTION CONTROL DEVICES – PART B: EMISSION INFORMATION

APCD Unit ID	Pollutants Controlled	Percent Control Efficiency		Inlet Stream To APCD		Exit Stream From APCD		Pressure Drop Across Unit (Inches of water)
		Design	Actual	lb/hr	Method of Determination	lb/hr	Method of Determination	
CY1	PM PM_{10} $PM_{2.5}$	≥ 95% ≥ 80% ≥ 25%	≥ 95% ≥ 80% ≥ 25%	Unknown		20.00 15.50 4.00	AP-42 Calculation	2" – 10"
CY2	PM PM_{10} $PM_{2.5}$	≥ 95% ≥ 80% ≥ 25%	≥ 95% ≥ 80% ≥ 25%	Unknown		16.00 12.40 3.20	AP-42 Calculation	2" – 10"
BH1	PM PM_{10} $PM_{2.5}$	≥ 99.9%	≥ 99.9%	Unknown		14.74 14.74 14.74	Grain Loading Calculation	0.5" – 7"
BH2	PM PM_{10} $PM_{2.5}$	≥ 99.9%	≥ 99.9%	Unknown		1.80 1.80 1.80	Grain Loading Calculation	0.5" – 7"

Facility Name: Tifton Peanut Company, LLC – Plants #2 and #3 **Date of Application:** 9/5/2017

FORM 4.00 – EMISSION INFORMATION

Emission Unit ID	Air Pollution Control Device ID	Stack ID	Pollutant Emitted	Emission Rates				
				Hourly Actual Emissions (lb/hr)	Hourly Potential Emissions (lb/hr)	Actual Annual Emission (tpy)	Potential Annual Emission (tpy)	Method of Determination
*Refer to **Attachment A** for detailed emissions information.								

Facility Name: Tifton Peanut Company, LLC – Plants #2 and #3 **Date of Application:** 9/5/2017

FORM 7.00 – AIR MODELING INFORMATION: Stack Data

Stack ID	Emission Unit ID(s)	Stack Information			Dimensions of largest Structure Near Stack		Exit Gas Conditions at Maximum Emission Rate			
		Height Above Grade (ft)	Inside Diameter (ft)	Exhaust Direction	Height (ft)	Longest Side (ft)	Velocity (ft/sec)	Temperature (°F)	Flow Rate (acfm)	
									Average	Maximum
CY1S	CY1	≈ 8	≈ 2' x 2.5'	Vertical	-	-	≈ 60	Ambient	< 18,000	18,000
CY2S	CY2	≈ 10	≈ 1.75	Vertical	-	-	≈ 83.2	Ambient	< 12,000	12,000
BH1S	BH1	≈ 20	≈ 4	Vertical	-	-	≈ 114.1	Ambient	< 86,000	86,000
BH2S	BH2	≈ 18	≈ 1.67	Vertical	-	-	≈ 80.2	Ambient	< 10,500	10,500

NOTE: If emissions are not vented through a stack, describe point of discharge below and, if necessary, include an attachment. List the attachment in Form 1.00 *General Information*, Item 16.

Attachment B - Facility Emission Equipment and Source Code List
Tifton Peanut Company, LLC - Plants #2 and #3
Tifton, Georgia

Emission Unit	Emission Unit Source Code	Control Device/Stack Source Code
Buying Point - Plant #2		
Farmerstock Buying Point Receiving*	REC1	-
Buying Point Cleaner	CL1	CY1
Farmerstock Buying Point Loadout*	LO	-
Shelling Plant - Plant #3		
Shelling Plant Receiving*	REC2	-
Air Gap Cleaner	SAG	CY2
Shelling Plant Baghouse #1	SH1	BH1
Seed Treating Baghouse #1	ST1	BH2
Hull Loadout*	HL	-

* Fugitive PM emissions only.

Attachment A - Emission Inventory Calculations

Tifton Peanut Company, LLC - Plants #2 and #3

Tifton, Georgia

Emission Source (I.D. No.) [A]	Operational & Process Equipment Feeding Source	Material Input	Maximum Throughput [P]		Max. Annual Operating Hours	Emission Factor	Units	Pollutant Type	Emissions Control	Control Device Efficiency (%)	Maximum Controlled Emissions: Stack Emission Rate (Lbs/Hr)	Stack Emission Rate (Tons/yr)	Fugitive Emission Rate (Lbs/Hr)	Fugitive Emission Rate (Tons/yr)
Buying Point Plant #2														
Buying Point Receiving (REC1)	Unloading of Farmerstock Peanuts at Dump Pits (Two dump pits total)	Farmerstock Peanuts	50	Tons/hr	1,800 [O]	0.06	lb/Ton [B]	PM	None		N/A	N/A	3.00	2.70
			90,000	Tons/yr		0.012	lb/Ton [B, C]	PM_{10}			N/A	N/A	0.60	0.54
						0.002	lb/Ton [B, D]	$PM_{2.5}$			N/A	N/A	0.10	0.09
Buying Point Cleaner (CL1) (CY1)	Nolin Pioneer Cleaner [H]	Farmerstock Peanuts	50	Tons/hr	1,800 [O]	0.4	lb/Ton [B]	PM	Cyclone	Emission Factor includes control device	20.00	18.00	N/A	N/A
			90,000	Tons/yr		0.31	lb/Ton [B]	PM_{10}			15.50	13.95	N/A	N/A
						0.080	lb/Ton [B, K]	$PM_{2.5}$			4.00	3.60	N/A	N/A
Farmerstock Loadout (LO)	Truck Loading of Farmerstock from storage bins	Farmerstock Peanuts	50	Tons/hr	1,800 [O]	0.086	lb/Ton [E]	PM	None		N/A	N/A	4.30	3.87
			90,000	Tons/yr		0.029	lb/Ton [E]	PM_{10}			N/A	N/A	1.45	1.31
						0.0049	lb/Ton [E, D]	$PM_{2.5}$			N/A	N/A	0.25	0.22
Shelling Plant - Plant #3														
Shelling Plant Receiving (REC2)	Unloading of Farmerstock Peanuts at Dump Pits (one dump pit total)	Farmerstock Peanuts	50	Tons/hr	5,000 [S]	0.06	lb/Ton [B]	PM	None		N/A	N/A	3.00	1.20
			40,000	Tons/yr [F]		0.012	lb/Ton [B, C]	PM_{10}			N/A	N/A	0.60	0.24
						0.002	lb/Ton [B, D]	$PM_{2.5}$			N/A	N/A	0.10	0.04
Shelling Air Gap Cleaner #1 (SAG) (CY2)	Shelling Plant Air Gap Cleaner #1 [H]	Farmerstock Peanuts	40	Tons/hr	5,000 [S]	0.4	lb/Ton [B]	PM	Cyclone	Emission Factor includes control device	16.00	8.00	N/A	N/A
			40,000	Tons/yr [F]		0.31	lb/Ton [B]	PM_{10}			12.40	6.20	N/A	N/A
						0.080	lb/Ton [B, K]	$PM_{2.5}$			3.20	1.60	N/A	N/A
Shelling Plant Baghouse (SH1) (BH1)	Sheller, Gravity Separator and other equipment aspirated by BH1 [H]	Farmerstock Peanuts	8	Tons/hr [G]	5,000 [S]	-	lb/Ton	PM	Baghouse	0.02 gr/dscf [I]	14.74	36.86	N/A	N/A
			86,000	CFM		-	lb/Ton	PM_{10}		0.02 gr/dscf [I]	14.74	36.86	N/A	N/A
			40,000	Tons/yr		-	lb/Ton	$PM_{2.5}$		0.02 gr/dscf [I]	14.74	36.86	N/A	N/A
Hull Loadout (HL)	Hull Loadout - loading of hulls into truck for transport offsite	Peanut Hulls	1.7	Tons/hr [J]	5,000 [S]	0.086	lb/Ton [E]	PM			N/A	N/A	0.14	0.36
			8,400	Tons/yr [J]		0.029	lb/Ton [E]	PM_{10}			N/A	N/A	0.05	0.12
						0.0049	lb/Ton [E]	$PM_{2.5}$			N/A	N/A	0.01	0.02
Seed Treating Baghouse (ST1) (BH2)	Seed Treating System	Shelled Peanuts (Seedstock)	8	Tons/hr [G]	5,000 [L,S]	-	lb/Ton	PM	Baghouse	0.02 gr/dscf [I]	1.80	4.50	N/A	N/A
			10,500	CFM		-	lb/Ton	PM_{10}		0.02 gr/dscf [I]	1.80	4.50	N/A	N/A
						-	lb/Ton	$PM_{2.5}$		0.02 gr/dscf [I]	1.80	4.50	N/A	N/A
						.25% of PM Emissions [N]		Seed Treating Fungicide [M]			0.0045	0.011	N/A	N/A

	Maximum Controlled Emissions: Stack Emission Rate (Lbs/Hr)	Stack Emission Rate (Tons/yr)	Fugitive Emission Rate (Lbs/Hr)	Fugitive Emission Rate (Tons/yr)
PM	52.54	67.36	10.44	8.13
PM_{10}	44.44	61.51	2.70	2.21
$PM_{2.5}$	23.74	46.56	0.46	0.38

NOTES:

A - Emission Unit ID, refer to Attachment B for complete list.

B - Emission Factor from AP-42 Almond Processing Table 9.10.2.1-1.

C - PM_{10} emissions for unloading operations estimated at 20% of PM emissions. See Reference 3.

D - $PM_{2.5}$ emission factor assumed to be 17% of the applicable PM_{10} emission factor. See Reference 2.

E - Emission Factor from AP-42 Grain Processing Facilities Table 9.9.1-1.

F - Process is "bottle-necked" at 8 tons/hour. Air Gap system designed faster than shelling capacity as Air Gap system is intended to operate less than other shelling plant equipment. See Note G below.

G - Design capacity of new Shelling Plant and seed treating system is 8 tons/hour.

H - The baghouse or cyclone associated with this process serve a primary product processing function and a secondary air pollution control function. The associated process can not operate without the baghouse or cyclone because these aspiration devices act to recover valuable product (i.e., peanuts and peanut hulls). Therefore, potential emissions from these processes incorporate the efficiencies from baghouse or cyclone control.

I - Manufacturer guaranteed removal efficiency is 0.02 gr/dscf. Expected removal efficiency expected to be much higher (0.005 gr/dscf or less) based on stack testing of similar Facility located in Colquitt, Georgia.

J - Approximately 21% of peanut weight is hulls. 8 TPH x 25%.

K - For cyclones, PM2.5 fraction is 20% of total PM (gravity separating). See Table 3 of Reference 1 and associated plots.

L - Seasonal operation. Max season that seed treating operating would occur would be November 1 - May 31, which equates to 5,088 hours/year.

M - Emissions in the seed treating fungicide include talc, starch, silica (amorphous), calcium silicate, azoxystrobin, mefenoxam and fludioxonil. None of these are known Hazardous Air Pollutants. Refer to SDS in Attachment F for details.
N - Fungicide is applied at a max rate of 4 oz/100 pounds or 5 pounds/ton, which equates to 0.25%. Assumed that fungicide emissions are in the dust (PM) emissions. Therefore, PM emissions multiplied by 0.25% to calculate the fungicide emissions.
O - Operations are restricted to a maximum 75 days/year, due to seasonal harvest. Operations will only occur during seasonal harvest, which is typically Sept 15 - Dec 1.
P - There are significant differences in maximum throughput (used for calculations) and actual throughput. Average Plant #2 throughput is 10,000 - 20,000 tons/year. Expected Plant #3 throughput is 10,000 - 20,000 tons/year.
Q - Operations that occurs indoors and have no emission include peanut sizing, sorting and packaging.
R - The Facility also has multiple natural gas fired peanut dryers used to dry recently harvested peanuts. Peanut drying operations are seasonal. Dryer combustion emissions are exempt per GA Rule 931-3-1-.03(6)(b)(1). The largest dryer is approximately 1.1 mmBtu/hr.
S - Annual operating hours limited to 5,000 hours/year to comply with Permit By Rule, GA Rule 391-3-1-.03(11)(b)11.

References:

References are available upon request.