



NARRATIVE

TO: Hamid Yavari
FROM: Jon Howard
DATE: September 21, 2017

Facility Name: **Tifton Peanut Company, LLC- Plant #2 and #3**

AIRS No.: 27700074

Location: Tifton, GA (Tift County)

Application #: 26207

Date of Application: September 6, 2017

Background Information

Tifton Peanut Company, LLC-Plant #2 and #3 submitted a Permit-by-Rule application requesting authorization to construct and operate a new peanut shelling facility (Plant #3) to be located at 225 Windy Hill Road in Tifton Georgia (Tift County). The location is in one of the attainment counties. The facility will be a permit-by-rule minor source with particulate matter as the primary pollutant.

Tifton Peanut Company, LLC Plant #2, is an existing peanut buying point, which consists of receiving, storage, cleaning and load-out operations. The system is used seasonally 10 to 12 weeks a year during the local peanut harvest.

Purpose of Application

The facility submitted an air quality permit application, which was received on September 7, 2017, and assigned Application No. 26207. The application is for the construction and operation of a new peanut shelling facility, Plant #3, and permitting the already existing Plant #2.

The shelling plant (Plant #3) will receive peanuts and the peanuts will be cleaned, shelled, sorted, sized and bagged. The peanuts will be sold as peanuts, peanut seeds, and oil stock. The peanut hulls will be loaded onto a truck for transport offsite.

The shelling plant (Plant #3) capacity will be 8 tons per hour. The annual production is dependent on crop yield. The peanut shelling operations utilize aspiration/separation air from a baghouse fan (BH1). This unit serves a primary purpose of product collection/separation and a secondary purpose of air pollution control. A public advisory was issued; it expired on October 13, 2017. No comments were received from the public.

Equipment List

The following table lists the equipment at the facility.

**Tifton Peanut Company, LLC- Plant #2 and #3
Tifton, Georgia (Tift County)**

Facility Description⁽¹⁾

Emission Units		Associated Control Devices	
Source Code	Description	Source Code	Description
REC1	Buying Point Receiving	None	N/A
CL1	Buying Point Cleaner	CY1	Cyclone #1
LO	Farm stock Loadout	None	N/A
REC2	Shelling Plant Receiving	None	N/A
SAG	Shelling Air Gap Cleaner #1	CY2	Cyclone #2
SH1	Shelling Plant Baghouse	BH1	Baghouse #1
HL	Hull Loadout	None	N/A
ST1	Seed Treating System	BH2	Baghouse #2

- (1) This "Facility Description" contains information regarding specific emissions points and was created as a reference for certain other Conditions in this Permit (or Permit Amendment). It is not intended to be a comprehensive list of all air pollution sources at this facility and may not include every minor or fugitive emission source. Future minor modifications or additions at this facility may be exempted from permitting by the Georgia Rules for Air Quality Control and may occur without causing this Attachment to be updated.

Emissions Summary

The table below summarizes PM, PM₁₀, and PM_{2.5} emissions from the facility.

**Facility-Wide Emissions
(in tons per year)**

Pollutant	Potential Emissions	Actual Emissions
	Uncontrolled	Controlled
PM	67.36	<67.36
PM ₁₀	61.51	<61.51
PM _{2.5}	46.56	<46.56

Regulatory Applicability**Georgia Rule 391-3-1-.02(2)(b) - Visible Emissions**

The facility is subject to Georgia Rule (b), which limits the opacity to 40 percent, unless a more stringent opacity limit is specified in another regulation.

Georgia Rule 391-3-1-.02(2)(e) – Particulate Matter from Manufacturing Processes

The facility is subject to Georgia Rule (e), which establishes an allowable rate of particulate emissions for manufacturing processes as follows.

$E = 4.1 P^{0.67}$; for process input weight rate up to and including 30 tons per hour.

$E = 55 P^{0.11} - 40$; for process input weight rate above 30 tons per hour.

According to Application No. 23123, the average process rate for the facility is 29.75 tons per hour and the maximum is 30 tons per hour.

Georgia Rule 391-3-1-.02(2)(n) – Fugitive Dust

Georgia Rule (n) requires the facility to take reasonable precautions to prevent fugitive dust from becoming airborne. Operations at the facility are covered by this generally applicable rule. The appropriate precautions must be taken to prevent fugitive dust from becoming airborne and ensure that opacity from fugitive dust sources is less than 20 percent as required by this rule.

Permit Conditions

Conditions 1.1 through 1.5 contain the current standard general requirement template conditions.

Condition 2.1 limits the particulate matter from the entire facility to the rate derived from $E = 4.1(P)^{0.67}$ where E equals the allowable particulate emission rate in pounds per hour and P equals the process input weight rate in tons per hour in accordance with Georgia Rule (e).

Condition 2.2 limits the process input rate of unshelled nuts per any 12 month period.

Condition 2.3 limits the process hours per any 12 month period.

Condition 2.4 states the Permittee must operate the baghouses when the operation is running.

Condition 2.5 assures the Permittee does not allow an opacity over 40 percent.

Condition 3.1 is the standard template condition for fugitive emissions in accordance with Georgia Rule (n).

Condition 4.1 is the standard template condition for routine maintenance for process and control equipment.

Condition 5.1 requires the installation, calibration, and maintenance of a device to measure pressure drop across all baghouses.

Condition 5.2 requires the facility to establish the pressure drop ranges for all baghouses.

Condition 5.3 requires daily visible emission checks on the baghouses.

Condition 5.4 requires the facility to develop and implement a Preventative Maintenance Program for the baghouses.

Condition 5.5 requires the facility to have an adequate inventory of bags to replace defective bags in each baghouse.

Condition 5.6 shall assure the Permittee maintains all cyclones according to rule 391-3-1-.03(2)(c).

Condition 6.1 contains the current standard template conditions for performance tests.

Condition 7.1 requires the Permittee to maintain records of maintenance and inspection of all dust collection devices and fugitive dust emission points for 5 years.

Condition 7.2 requires the Permittee to keep records of amount of peanuts process each month and use the monthly records to calculate the amount of peanut throughput during each consecutive six month period.

Condition 8.1 contains the current standard template condition for the Division's right to amend the permit.

Condition 8.2 requires the facility to pay a permit fee.

Condition 8.3 requires the facility to keep a copy of the permit onsite.

Toxic Impact Assessment

The main pollutant emitted from this facility will be PM. No hazardous air pollutants or toxic air pollutants are expected to be emitted from this facility. Therefore, no toxic impact assessment was performed.

Summary & Recommendations

I recommend the Permit-by-Rule No. 5159-277-0074-R-01-0 be issued to Tifton Peanut Company, LLC - Plant #2 and #3 for the construction and operation of a peanut shelling facility. The proposed plant will be located in Tifton (Tift County), GA. This facility is a Permit-by-Rule minor source and is assigned to the Southwest District Office in Albany for compliance and inspection purposes. The public advisory expired on October 13, 2017 and no comments were received.