Air Quality Permit

In accordance with the provisions of the Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq and the Rules, Chapter 391-3-1, adopted pursuant to and in effect under that Act,

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

Facility Address: 225 Windy Hill Road
Tifton, Georgia 31793 Tift County

Mailing Address: P.O. Box 1809
Tifton, GA 31793

Facility AIRS Number: 04-13-277-00074

is issued a Permit for the following:

The construction and operation of a peanut shelling facility. This Permit is issued for the purpose of establishing practically enforceable emission limitations such that the facility will not be considered a major source with respect to Title V of the Clean Air Act Amendments of 1990.

This Permit is conditioned upon compliance with all provisions of The Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq, the Rules, Chapter 391-3-1, adopted and in effect under that Act, or any other condition of this Permit.

This Permit may be subject to revocation, suspension, modification or amendment by the Director for cause including evidence of noncompliance with any of the above; or for any misrepresentation made in Application No. 26207 dated September 6, 2017; any other applications upon which this Permit is based; supporting data entered therein or attached thereto; or any subsequent submittals or supporting data; or for any alterations affecting the emissions from this source.

This Permit is further subject to and conditioned upon the terms, conditions, limitations, standards, or schedules contained in or specified on the attached 6 pages.

[Signed]

Richard E. Dunn, Director
Environmental Protection Division
1. General Requirements

1.1 At all times, including periods of startup, shutdown, and malfunction, the Permittee shall maintain and operate this source, including associated air pollution control equipment, in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Division which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection or surveillance of the source.

1.2 The Permittee shall not build, erect, install or use any article, machine, equipment or process the use of which conceals an emission which would otherwise constitute a violation of an applicable emission standard. Such concealment includes, but is not limited to, the use of gaseous diluents to achieve compliance with an opacity standard or with a standard that is based on the concentration of a pollutant in the gases discharged into the atmosphere.

1.3 The Permittee shall submit a Georgia Air Quality Permit application to the Division prior to the commencement of any modification, as defined in 391-3-1-.01(pp), which may result in air pollution and which is not exempt under 391-3-1-.03(6). Such application shall be submitted sufficiently in advance of any critical date involved to allow adequate time for review, discussion, or revision of plans, if necessary. The application shall include, but not be limited to, information describing the precise nature of the change, modifications to any emission control system, production capacity and pollutant emission rates of the plant before and after the change, and the anticipated completion date of the change.

1.4 Unless otherwise specified, all records required to be maintained by this Permit shall be recorded in a permanent form suitable for inspection and submission to the Division and shall be retained for at least five (5) years following the date of entry.

1.5 In cases where conditions of this Permit conflict with each other for any particular source or operation, the most stringent condition shall prevail.

2. Allowable Emissions

2.1 The Permittee shall not discharge or cause the discharge into the atmosphere, from the entire facility, particulate matter in excess of 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.

[391-3-1-.02(2)(e)1(i)]

2.2 The Permittee shall limit the process input to 130,000 tons of unshelled nuts during any 12 consecutive month period.

[Avoidance of 40 CFR 70]
2.3 The Permittee shall limit the annual hours of operation to not exceed 5,000 hours during any 12 consecutive month period.

[Avoidance of 40 CFR 70]

2.4 The Permittee shall operate the Baghouses BH#1 and BH#2 at all times when any of the emission units that exhaust through these baghouse filters in the shelling area and seed treatment area are in operation.

[40 CFR 70 Avoidance]

2.5 The Permittee shall not cause, let, suffer, permit, or allow emissions from any air contaminant source the opacity of which is equal to or greater than 40 percent.

[391-3-1-.02(2)(b)1]

3. Fugitive Emissions

3.1 The Permittee shall take all reasonable precautions to prevent fugitive dust from becoming airborne from any operation, process, handling, and transportation or storage facility. The opacity from any fugitive dust source shall not equal or exceed twenty percent. Reasonable precautions that should be taken to prevent dust from becoming airborne include, but are not limited to, the following:

[391-3-1-.02(2)(n)] [Vault GA-003-EL, 02/10]

a. Use, where possible, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads or the clearing of land;

b. Application of asphalt, water, or suitable chemicals on dirt roads, materials, stockpiles, and other surfaces that can give rise to airborne dusts;

c. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty materials. Adequate containment methods can be employed during sandblasting or other similar operations;

d. Covering, at all times when in motion, open-bodied trucks, transporting materials likely to give rise to airborne dust; and

e. The prompt removal of earth or other material from paved streets onto which earth or other material has been deposited.

4. Process & Control Equipment

4.1 Routine maintenance shall be performed on all air pollution control equipment. Maintenance records shall be recorded in a permanent form suitable and available for inspection by the Division. The records shall be retained for at least five years following the date of such maintenance.
5. Monitoring

5.1 The Permittee shall install, calibrate, and maintain a device for measuring the pressure drop across all baghouses.

5.2 Within 60 days after the initial startup the Permittee shall submit operating pressure drop ranges for all baghouses.

5.3 Once each day, or portion of each day of operation, the Permittee shall perform a check for visible emissions from all baghouses and inspect emissions units for mechanical problems or malfunction. For any observation of visible emissions, mechanical problems, or malfunctions, the Permittee shall take corrective action and reinspect the equipment to verify that no visible emissions exist and that any mechanical problems or malfunctions have been corrected. The observations and corrective actions shall be recorded in a log and maintained in a condition suitable for inspection by, or submittal to, the Division.

The person performing the determination shall stand a distance of at least 15 feet which is sufficient to provide a clear view of the plume against a contrasting background with the sun in the 140° sector at his/her back. Consistent with this requirement, the determination shall be made from a position such that the line of vision is approximately perpendicular to the plume direction. Only one plume shall be in the line of sight at any time when multiple stacks are in proximity to each other.

5.4 Within 60 days of the startup of the facility, the Permittee shall develop and implement a Preventive Maintenance Program for the baghouses to assure that the provisions of Condition 1.1 are met. All QA/QC practices and criteria shall be stated in the Preventive Maintenance Program. The program shall be subject to review and, if necessary to assure compliance, modification by the Division and shall include the pressure drop ranges that indicate proper operation for each baghouse. At a minimum, the following operation and maintenance checks shall be made on at least a weekly basis, and a record of the findings and corrective actions taken shall be kept in a maintenance log:

[391-3-1-.02(6)(b)1] [Vault OT-058-MO, 10/12]

a. Record the pressure drop across each baghouse and ensure that it is within the appropriate range.

b. For baghouses equipped with compressed air cleaning systems, check the system for proper operation. This may include checking for low pressure, leaks, proper lubrication, and proper operation of timer and valves.

c. For baghouses equipped with reverse air cleaning systems, check the system for proper operation. This may include checking damper, bypass, and isolation valves for proper operation.
d. For baghouses equipped with shaker cleaning systems, check the system for proper operation. This may include checking shaker mechanism for loose or worn bearings, drive components, mountings; proper operation of outlet/isolation valves; proper lubrication.

e. Check dust collector hoppers and conveying systems for proper operation.

5.5 The Permittee shall maintain an inventory of filter bags such that an adequate supply of bags is on hand to replace any defective bags in each baghouse.

5.6 The permittee shall maintain and operate all cyclones in accordance with but not necessarily limited to the following:
[391-3-1-.03(2)(c)]

a. The exterior of the cyclone is free of holes in the body and ensure that there is no evidence of malfunction.

b. No bridging and plugging occurs in hopper.

c. The particulate transfer devices are in proper operation to ensure dust removal.

6. Performance Testing

6.1 The Permittee shall cause to be conducted a performance test at any specified emission point when so directed by the Division. The following provisions shall apply with regard to such tests:

a. All tests shall be conducted and data reduced in accordance with applicable procedures and methods specified in the Division’s Procedures for Testing and Monitoring Sources of Air Pollutants.

b. All test results shall be submitted to the Division within sixty (60) days of the completion of testing.

c. The Permittee shall provide the Division thirty (30) days prior written notice of the date of any performance test(s) to afford the Division the opportunity to witness and/or audit the test, and shall provide with the notification a test plan in accordance with Division guidelines.

d. All monitoring systems and/or monitoring devices required by the Division shall be installed, calibrated and operational prior to conducting any performance test(s). For any performance test, the Permittee shall, using the monitoring systems and/or monitoring devices, acquire data during each performance test run. All monitoring system and/or monitoring device data acquired during the performance testing shall be submitted with the performance test results.
7. Notification, Reporting and Record Keeping Requirements

7.1 The Permittee shall maintain records of maintenance and inspection of all dust collection devices and fugitive dust emission points. This information shall be recorded in a permanent form suitable and available for inspection. These records shall be retained for at least five years following date of entry.

7.2 The Permittee shall keep records of amount of peanuts processed each month and use the monthly records to calculate the amount of peanut throughput during each consecutive six month period (e.g. January through June, February through July, March through August). The Permittee shall notify the Division in writing if the amount of peanut throughput exceeds one-half of the limit in Condition 2.2 during any six consecutive month period. This notification shall be postmarked by the fifteenth day of the month following such an exceedance and shall include an explanation of how the Permittee intends to maintain compliance with the annual limit stated in Condition 2.2.

8. Special Conditions

8.1 At any time that the Division determines that additional control of emissions from the facility may reasonably be needed to provide for the continued protection of public health, safety and welfare, the Division reserves the right to amend the provisions of this Permit pursuant to the Division's authority as established in the Georgia Air Quality Act and the rules adopted pursuant to that Act.

8.2 The Permittee shall calculate and pay an annual Permit fee to the Division. The amount of the fee shall be determined each year in accordance with the “Procedures for Calculating Air Permit Fees.”

8.3 The Permittee shall keep at the permitted facility the originals or complete copies of this Air Quality Permit and any subsequent Amendments to it.
ATTACHMENT A

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

Facility Description(1)

<table>
<thead>
<tr>
<th>Emission Units</th>
<th>Associated Control Devices</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Source Code</strong></td>
<td><strong>Description</strong></td>
</tr>
<tr>
<td>REC1</td>
<td>Buying Point Receiving</td>
</tr>
<tr>
<td>CL1</td>
<td>Buying Point Cleaner</td>
</tr>
<tr>
<td>LO</td>
<td>Farm stock Loadout</td>
</tr>
<tr>
<td>REC2</td>
<td>Shelling Plant Receiving</td>
</tr>
<tr>
<td>SAG</td>
<td>Shelling Air Gap Cleaner #1</td>
</tr>
<tr>
<td>SH1</td>
<td>Shelling Plant Baghouse</td>
</tr>
<tr>
<td>HL</td>
<td>Hull Loadout</td>
</tr>
<tr>
<td>ST1</td>
<td>Seed Treating System</td>
</tr>
</tbody>
</table>

(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.