Title V Air Operation Permit Renewal
Permit No. 0690002-017-AV

APPLICANT

The applicant for this project is Cutrale Citrus Juices USA, Inc. The applicant's responsible official and mailing address are:

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FACILITY DESCRIPTION

The applicant operates the Cutrale Citrus Juices USA, Inc.-Leesburg Facility, which is located 11 Cloud Street in Leesburg, Lake County, FL.

The Leesburg citrus processing plant consists of one citrus peel dryer with waste heat evaporator, one pellet cooling reel, a steam boiler, a relocatable steam boiler and a cogeneration system. The facility produces various citrus juice products and animal feed.

The citrus peel dryer is a 52.2 tons/hour feed dryer (90.0 MMBtu) with two 100,000 lb/hour waste heat evaporators and one 50,000 lb/hr waste heat evaporator. The dryer was installed in 1972. This emissions unit is regulated under Rule 62-210.300, F.A.C., Permits Required.

The pellet cooling reel has a cyclone to recover product from the exhaust stream. The maximum dried peel throughput is 14 tons per hour. The pellet cooler was installed in 1972. This emissions unit is regulated under Rule 62-210.300, F.A.C., Permits Required.

Boiler #4 is a Babcock & Wilcox Model 1079 boiler. The maximum operation heat input rate is 78.0 million Btu per hour and fires natural gas and 0.1 percent sulfur No. 2 fuel oil. The initial startup date was 1991. The Relocatable Boiler is a John Zink Model M22935. The maximum operation heat input rate is 96.0 million Btu per hour and fires natural gas, only. The initial startup date was 2008. These emissions units are regulated under Rule 62-296.406, F.A.C., Fossil Fuel Steam Generators with less than 250 Million Btu per Hour Heat Input, New and Existing Units; and, NSPS-40 CFR 60, Subpart Dc, Small Industrial-Commercial-Institutional Steam Generating Units, adopted and incorporated by reference in Rule 62-204.800(8)(b)4., F.A.C.

The new cogeneration system includes a new gas turbine with a maximum heat input of 62.7 MMBtu/hr, an existing 4 MW electric generator, an existing ERI waste heat boiler, and an existing Coen duct burner with a maximum heat input of 99.9 MMBtu/hr. These emissions units are regulated under 40 CFR 60 Subpart KKKK, Standards of Performance for Stationary Gas Turbines, and Rule 62-296.406, F.A.C., Fossil Fuel Steam Generators with less than 250 Million Btu per Hour Heat Input, New and Existing Units.

There are 2 Emergency Generators located at the site, the Feed Mill Emergency Generator (EU 010) and the Cogeneration System Emergency Generator (EU 011). The Feed Mill Emergency Generator is a 250 KW (335 HP) Compression Ignition (CI) Caterpillar Engine. It was installed in February 2012. It uses No. 2 Fuel Oil (offroad diesel) – 0.1% sulfur. The Cogeneration System Emergency Generator is a 400 KW (536 HP) Compression Ignition (IC) Caterpillar Engine. It was installed in 1996. It uses No. 2 Fuel Oil (offroad diesel) – 0.1% sulfur. Both are subject to NESHAP Subpart ZZZZ and the Feed Mill Emergency Generator is subject to NSPS Subpart IIII.

Also included in this permit are miscellaneous unregulated/insignificant emissions units and/or activities.

PROJECT DESCRIPTION

The purpose of this permitting project is to renew the existing Title V operation permit (0690002-013-AV) for the above referenced facility.

PROCESSING SCHEDULE AND RELATED DOCUMENTS

Application for a Title V Air Operation Permit Renewal received **December 17, 2012**
Requested information received **January 25, 2013**
Application complete **January 25, 2013**

PRIMARY REGULATORY REQUIREMENTS

Title III: The facility is not identified as a major source of hazardous air pollutants (HAP).

Title V: The facility is a Title V major source of air pollution in accordance with Chapter 62-213, Florida Administrative Code (F.A.C.).

PSD: The facility is not a Prevention of Significant Deterioration (PSD) major source of air pollution in accordance with Rule 62-212.400, F.A.C.

NSPS: The facility does operate units subject to the New Source Performance Standards (NSPS) of 40 Code of Federal Regulations (CFR) 60.

- 40 CFR 60, Subpart A, General Provisions;
- 40 CFR 60, Subpart Dc, Small Industrial-Commercial-Institutional Steam Generating Units;
- 40 CFR 60, Subpart KKKK, Standards for Stationary Combustion Turbines; and
- 40 CFR 60, Subparts IIII, Stationary Compression Ignition Internal Combustion Engines.

NESHAP: The facility does operate units subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) of 40 CFR 63.

- 40 CFR 63, Subpart A, General Provisions;
- 40 CFR 63, Subpart ZZZZ, Stationary Reciprocating Internal Combustion Engines

CAIR: The facility is not subject to the Clean Air Interstate Rule (CAIR) set forth in Rule 62-296.470, F.A.C.

CAM: Compliance Assurance Monitoring (CAM) does not apply to any of the units at the facility. Generally speaking, for the CAM requirements of Part 64 to apply to an emissions unit, three conditions must be met: (1) The unit is subject to an emission limitation or standard for the applicable regulated air

pollutant; (2) The unit uses a control device to achieve compliance with any such emission limitation or standard; and, (3) The unit has potential pre-control device emissions of the applicable regulated air pollutant that are major. The emissions units with emissions limits or standards at this facility are:

1. the citrus peel dryer with a PM/PM_{10} standard;
   The citrus peel dryer includes an integral waste heat evaporator with water spray heads whose purpose is to keep the heat transfer surfaces clean; in doing so, it also reduces particulate matter. Since the waste heat evaporators are integral to the operation of the citrus peel dryers, they are not considered control devices.
2. the citrus pellet cooler with a PM/PM_{10} standard;
   The citrus pellet cooler has a cyclone to return product to the process and may not be considered a control device; also, the uncontrolled emissions of PM/PM_{10} are below major.
3. the cogeneration system turbine with NO_X and SO_2 standards;

and,

4. the two boilers with PM/PM_{10} and SO_2 standards.
   The turbine and the two boilers do not employ control devices to meet their emissions standards.

For these reasons, the CAM requirements of 40 CFR 64 do not apply to these emissions units.

PROJECT REVIEW

Changes that were made as part of this renewal include the following:

(1) Removal of previous EU No. 007 and the corresponding conditions because it was replaced with EU No. 009.

(2) Reformatting to reflect new Title V permit template.

(3) Several Specific Conditions have been relocated to the Appendices because of the new Title V permit template. The Specific Conditions were renumbered accordingly.

(4) Fuel oil (No. 2 fuel oil) will only be used for the emergency generators. Natural Gas will be the only fuel used for the other emission units. The applicable conditions regarding fuel usage were changed or deleted to reflect this fuel use change. Most of the continuous monitoring related conditions for the cogeneration system turbine were deleted because continuous compliance for NO_X is demonstrated by performing annual performance tests in accordance with 40CFR60.4400 (Subpart KKKK).

(5) Replacement of TV-6 with new Appendix TV.

(6) Various changes and additions to Appendix I-1, List of Insignificant Emissions Units and/or Activities.

RECENT PERMIT HISTORY

- Construction Permit (0690002-012-AC) issued **June 5, 2008; expired May 31, 2010.**

- Initial Title V Air Operation Permit (0690002-013-AV) issued **July 31, 2008; expires July 31, 2013.**
- Construction Permit Project (0690002-014-AC) Extension of Permit (0690002-012-AC) issued **February 22, 2011; expired September 30, 2011.**
- Permit Modification application (0690002-015-AV) withdrawn **October 17, 2011.**
- Permit Modification application (0690002-016-AV) withdrawn **October 17, 2011.**

PROJECT REVIEW

This project is the Title V Renewal of Title V Permit 0690002-013-AV. As part of this renewal, EU No. 007 has been removed from the permit because it was replaced by EU No. 009. Permits Nos. 0690002-012-AC and 0690002-014-AC authorized the replacement of the previous Solar Centaur H series gas turbine with a new, more efficient and lower-emitting Solar Centaur 50 unit. The new combustion turbine was integrated with the existing duct burner and heat recovery system

CONCLUSION

This project renews Title V air operation permit No. 0690002-013-AV. This Title V air operation permit renewal is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Chapters 62-4, 62-210 and 62-213, F.A.C.