FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
Central District
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803-3767

RICK SCOTT
GOVERNOR

HERSCHEL T. VINYARD JR.
SECRETARY

Electronic Mail – Received Receipt Requested
acorkum@cutrale.com

NOTICE OF FINAL TITLE V AIR OPERATION PERMIT

In the Matter of an
Application for Permit Renewal:

Aaron P. Corkum,
Environmental Affairs Manager
Cutrale Citrus Juices USA, Inc.
602 McKean Street
Auburndale, Florida 33823-4070

FINAL Permit Project No.: 0690002-017-AV
Cutrale Citrus Juices USA, Inc. - Leesburg Facility
Lake County

Enclosed is the **FINAL** Permit, No. 0690002-017-AV. The purpose is for the renewal of the Title V Air Operation Permit; No. 0690002-013-AV, issued on July 31, 2008. The facility is located in Lake County. This permit renewal is issued pursuant to Chapter 403, Florida Statutes (F.S.). There were no comments received from Region 4, U.S. EPA, regarding the **DRAFT/PROPOSED** Permit.

Any party to this order (permit) has the right to seek judicial review of the permit pursuant to Section 120.68, F.S., by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Legal Office; 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 of Appeal must be filed within 30 (thirty) days from the date this Notice is filed with the Clerk of the Department.

Executed in Orlando, Florida.

F. Thomas Lubozynski May 28, 2012

F. Thomas Lubozynski, P.E. Date
Waste & Air Resource Programs Administrator

FTL/sa

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF FINAL TITLE V AIR OPERATION PERMIT (including the FINAL Determination and the FINAL Permit) was sent by electronic mail (or a link to these documents made available electronically on a publicly accessible server) with received receipt requested before the close of business on May 28, 2013 to the persons listed below:

Mr. Aaron P. Corkum, Environmental Affairs Manager, Cutrale Citrus Juices USA, Inc.: acorkum@cutrale.com
Mr. Edward Priest, Environmental Coordinator, Cutrale Citrus Juices USA, Inc.: epriest@cutrale.com
Mr. Justin Olson, Environmental Engineer, Cutrale Citrus Juices USA, Inc.: jolson@cutrale.com
Mr. Scott Osbourn, P.E., Senior Consultant, Golder Associates, Inc.: sosbourn@golder.com
Ms. Ana Oquendo, U.S. EPA Region 4: Oquendo.Ana@epa.gov
Ms. Natasha Hazziez, U.S. EPA Region 4: Hazziez.natasha@epa.gov
Ms. Barbara Friday, DEP DARM: barbara.friday@dep.state.fl.us

Clerk Stamp

FILED, on this date, pursuant to §120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

(Clerk) May 28, 2013 (Date)

I. Comments.

No comments were received from the U.S. EPA during their 45-day review period of the DRAFT/PROPOSED Permit. The public notice was published in the Daily Commercial newspaper on April 3, 2013. No comments were received from the public.

On April 11, 2013, the Department received four comments from the consultant, Golder Associates, on behalf of the applicant. The following summarizes the comments and the Department's response.

1. The Consultant requested on behalf of the applicant that a portion of the description for the Process Steam Boiler (EU 004) be removed from the Final Permit. The portion refers to 0.1 percent sulfur No. 2 fuel oil, which is no longer used as a fuel for the boiler.

Response: The Department agreed with the rationale of this request and removed the double underlined text of the description from the final permit. Additionally, the single underlined text was added.

Process Steam Boiler #4 is a Babcock & Wilcox 1079 (Model Number) boiler. The maximum operation heat input rate is 78.0 million BTU per hour and <u>fires only</u> <u>fired</u> natural gas <u>and 0.1 percent sulfur No. 2 fuel oil</u>. The initial startup date was 1991.

2. The Consultant requested on behalf of the applicant to add language to the description for the Relocatable Boiler (EU 008). The Consultant explained that the boiler was leased, brought onsite for temporary use and removed. However, circumstances will arise and this boiler will be required in the future. When the need arises, Cutrale plans to lease a boiler that will be similar to the boiler initially permitted, but it won't be exactly the same.

Response: The Department agreed with the rationale of this request and added the following single underlined text and deleted the double underlined sentence:

Relocatable Boiler is a John Zink M22935 (Model Number) boiler <u>or equivalent boiler model. The Relocatable Boiler was leased, brought onsite for temporary use and was removed. However , circumstances will arise and this boiler will again be required in the future. When the need arises, Cutrale plans to lease a boiler that will be similar to the boiler initially permitted, but it won't be exactly the same.</u> The maximum heat input rate is <u>approximately</u> 96.0 million BTU per hour and fires only natural gas. <u>The initial startup date was 2008.</u>

3. The Consultant requested on behalf of the applicant to have the following language added to the Final Permit: <u>The permittee shall, on an annual basis, obtain the representative fuel sulfur concentration in the pipeline-quality natural gas as determined by the pipeline vendor. This information shall be obtained for the previous calendar year, no later than 4 months after the end of each calendar year.</u>

The reasons for added language are the following: 1) Demonstrate compliance with the sulfur limit listed in 40 CFR 60, Subpart KKKK and 2) Consistency with the language present in Title V Permit No. 1050023-028-AV, a Title V Permit for a different Cutrale Facility (Auburndale Facility).

Response: The Department agreed with the rationale of this request and added the following single underlined text as Condition No. 17 in Subsection D.:

D.17. The permittee shall, on an annual basis, obtain the representative fuel sulfur concentration in the pipeline-quality natural gas as determined by the pipeline vendor. This information shall be obtained for the previous calendar year, no later than 4 months after the end of each calendar year.

Additionally, the following single underlined text was added on Condition **D.6.**:

D.6. Sulfur Dioxide. Sulfur dioxide from the turbine shall be limited by firing only natural gas with 20 grains of sulfur or less per 100 standard cubic feet. Sulfur dioxide from the duct burner shall be limited by firing only natural gas with 20 grains of sulfur or less per 100 standard cubic feet. [Rules 62-204.800(8)(b), 62-213.440(b), and 62-296.406(2), F.A.C.; 40 CFR 60, Subpart KKKK, §60.4330, §60.4365 and §60.4370(c)]

The following double underline text/condition was removed because it was a duplicate condition (same as Condition **D.6.**):

D.13. Sulfur Dioxide. Compliance with the sulfur dioxide limit is demonstrated by the combustion of natural gas.

Some of the conditions were renumbered in the Subsection D., because one condition was removed (previous Condition **D.13.)** and one condition was added (current condition **D.17.**).

4. The Consultant provided the following comment on behalf of the applicant:

Cutrale was provided with tabular summaries in the Auburndale TV renewal, which was recently issued in the SW District. These included: *Table 1 – Summary of Air Pollutant Standards and Terms* and *Table 2 – Summary of Compliance Requirements*. Cutrale has found the summary tables to be a helpful reference and requests that similar summary tables be provided for the Leesburg Facility.

Response: The Department declined the request at this time. The Auburndale Title V Renewal is Permit No. 1050023-028-AV, a permit for the Cutrale Facility located in Auburndale, FL. The following response was provided to the applicant by email:

Regarding Comment 4, we will not include the tables as part of the attachments. Tables like these, especially since the tables specify the maximum allowable emissions standards and the compliance methods, could confuse or mislead the applicant if they have any mistakes.

Since Cutrale feels that these tables will be as helpful as a compliance tool for each facility, feel free to make your own tables based on the conditions in this permit. Additionally, Cutrale may request a compliance assistance visit from the Department at any time (DEP_CD@dep.state.fl.us). Part of the compliance assistance visit could be to help develop similar tables for the Leesburg Facility that were included as part of the recent Auburndale Title V renewal permit package. Again, the tables should be accurate, thorough, and complete.

II. Conclusion.

The applicant indicated by email that the above changes satisfied all of their comments. In conclusion, the permitting authority hereby issues the FINAL Permit.