Title V Air Operation Permit Renewal
Permit No. 1050023-028-AV

APPLICANT

The applicant for this project is Cutrale Citrus Juices USA, Inc. The applicant's responsible official and mailing address are: Aaron P. Corkum, Manager Environmental Affairs, Cutrale Citrus Juices USA, Inc. - Auburndale Facility, 602 McKean Street, Auburndale, Florida 33823.

FACILITY DESCRIPTION

The applicant operates the existing Cutrale Citrus Juices USA, Inc. - Auburndale Facility, which is located at 602 McKean Street, Auburndale, Florida 33823.

The existing citrus processing plant produces citrus juice products and animal feed. The plant consists of the following equipment: two 60,000 pounds/hour citrus peel dryers with associated waste heat evaporators (EU 001 and EU 003); four citrus peel/pellet coolers (EU 005 – EU007 and EU 010) and one backup feed cooler (EU 021); a 1,650 horsepower boiler (EU 018) with a maximum heat input rate of 99.9 Million British thermal units/hour; two nominal 4.4 megawatt combustion turbines with duct burners (EU 019 and EU 020); and four emergency diesel generators and an emergency fire pump (EU 022 - EU 024). Natural gas is the only fuel fired with the exception of the diesel fuel fired emergency generators and fire pump.

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

PROJECT DESCRIPTION

The purpose of this project is to renew Title V Air Operation Permit No. 1050023-024-AV. Modifications included in this project consist of removing all provisions and reference to the Cogeneration System Nos. 1 and 2 (EU 008 and EU 009) since they no longer exist on site and remove the provision of firing fuel oil. The use of fuel oil is obsolete. There is no equipment to fire fuel oil with the exception of the diesel fuel fired emergency generators and fire pump. An air construction permit shall be applied for prior to firing fuel oil in the future.

PROCESSING SCHEDULE AND RELATED DOCUMENTS

Initial (New) Title V Air Operation Permit issued 07/30/2008
Title V Air Operation Permit Revision issued 01/12/2010
Application for a Title V Air Operation Permit Renewal received 12/17/2012
Notice of Intent to Issue Air Permit issued **[Month day, year]**

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 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 emissions units subject to the New Source Performance Standards (NSPS) of 40 Code of Federal Regulations (CFR) 60. (The existing combustion turbines (EU Nos. 019 and 020) are subject to 40 CFR 60 Subpart KKKK (Stationary Combustion Turbines) and Subpart A (General Provisions). The Diesel Emergency Fire Pump Diesel CI RICE Engine (EU No. 025) is subject to 40 CFR 63 Subpart IIII (Stationary Compression Ignition Internal Combustion Engines) and Subpart A).

NESHAP: The facility does operate emissions units subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) of 40 CFR 63. (The existing emergency diesel CI RICE engines (EU Nos. 022 and

023) are subject to 40 CFR 63 Subpart ZZZZ (Stationary Reciprocating Internal Combustion Engines) and Subpart A (General Provisions).

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

PROJECT REVIEW

The renewal permit includes the following changes.

General Permit Format

The renewal permit is based on the Department's updated formats for a Title V air operation permit.

Section I. Facility Information

Subsection A. Facility Description.

1. Included emission unit details, as well as the existing emergency generators and fire pump in the facility description.
2. Included in the facility description that only natural gas is fired at the facility with the exception of the emergency generators and fire pump.

Subsection B. Summary of Emissions Units

1. Removed the Cogeneration Systems Nos. 1 and 2 (EU 008 and EU 009).
2. Classified the emergency generator and fire pump as a regulated emissions units.

Section III. Emissions Units and Specific Conditions.

Subsection A. Emissions Unit Nos. 001 and 003

1. Added a description of the exhaust stack.
2. Removed all provisions for the use of fuel oil. The physical storage capacity for fuel oil does not exist; therefore is obsolete. The following changes were made based on the removal of fuel oil:
    a) The maximum allowable heat input rate is based on a monthly average.
    b) Changed the requirement for fuel usage records from daily logs to monthly logs.

Subsection C. Emissions Unit No. 018

1. Added a description of the low NOx burner and exhaust stack parameters.
2. Removed all provisions for the use of fuel oil. The physical storage capacity for fuel oil does not exist; therefore is obsolete. The following changes were made based on the removal of fuel oil:
    a) The maximum allowable heat input rate is based on a monthly average.
    b) Removed the requirement for daily logs for fuel usage to meet the requirements of NSPS 40 CFR 60, Subpart Dc, which requires the applicant to maintain records during each calendar month.
3. Removed all reference to Rule 62-212.400(BACT), F.A.C. Best Available Control Technology (BACT) in accordance with this rule is not applicable to this emission unit.
4. Moved the condition for "Best Management Practices for Carbon Monoxide" from common condition to this subsection.

Subsection D. Emissions Unit Nos. 019 and 020

1. Updated and added a description of the low NOx burner and exhaust stack parameters.

2. Removed all provisions for the use of fuel oil. The physical storage capacity for fuel oil does not exist; therefore is obsolete. The following changes were made based on the removal of fuel oil:
    a) The maximum allowable heat input rate is based on a monthly average.
    b) Changed the requirement for fuel usage records from daily logs to monthly logs.
3. Removed reference and provisions for the completion of the construction of the new CTs.
4. Moved the condition for "Best Management Practices for Carbon Monoxide" from common condition to this subsection.

Subsection E. Emissions Unit Nos. 022 - 024

1. Removed the Cogeneration Systems Nos. 1 and 2 (EU 008 and EU 009) since they no longer exist on the site; therefore are obsolete.
2. Renamed and added this subsection to include the emergency generators and identify the applicable requirements of NESHAP 40 CFR 63, Subpart ZZZZ.

Subsection F. Emission Unit No. 025

Removed "Common Conditions" since "Monitoring of Operations" is included in Appendix TR, Facility-Wide Testing Requirements and "Excess Emissions" are identified under their applicable emission unit subsection.

Subsection G. Common Conditions – Test Procedures

Removed this subsection since test procedures are identified in Appendix TR, Facility-Wide Testing Requirements.

Subsection H. Common Conditions – Best Management Practices

Removed this subsection since the "Best Management Practices" are identified in the applicable emission unit subsections.

Subsection I. Common Conditions – NSPS

Removed this subsection since the conditions are included in Appendix NSPS, Subpart KKKK.

Appendices

3. Renamed "Appendix A-1, Abbreviations, Acronyms, Citations, and Identification Numbers" to "Appendix A, Glossary".
4. Removed "Appendix CS, Calibration Schedule." This schedule was included in "Appendix TR, Facility Wide Testing Requirements".
5. Added "Appendix NSPS, Subpart A – General Provisions", Appendix NSPS, Subpart KKKK - Standards of Performance for Stationary Combustion Turbines" and Appendix NSPS, Subpart IIII - Standards of Performance for Stationary Compression Ignition Internal Combustion Engines."
6. Updated and renamed "Appendix I - 1" to "Appendix I, List of Insignificant Emission Units and/or Activities".
7. Added "Appendix RR, Facility-Wide Reporting Requirements" to identify generally applicable notification and reporting requirements.
8. Removed "Appendix SS-1, Stack Sampling Facilities" by including these testing requirements into the new "Appendix TR, Facility-Wide Testing Requirements", which identifies the generally applicable testing requirements.
9. Updated and renamed "Appendix TV-6, Title V Conditions" to "Appendix TV, Title V General Conditions".

Referenced Attachments

Added the below attachments following the appendices:

10. Table H, Permit History.
11. Table 1, Summary of Air Pollutant Standards and Terms. This table identifies the allowable emission standards and the equivalent emission limits. This table summarizes information for convenience purposes only.
12. Table 2, Compliance Requirements. This table identifies the applicable test methods, frequency and minimum compliance testing duration of the applicable allowable emissions standards identified in Table 1. This table summarizes information for convenience purposes only.

CONCLUSION

This project renews Title V Air Operation Permit No. 1050023-024-AV, which was issued on January 12, 2010. This Title V air operation permit renewal is issued under the provisions of Chapter 403, Florida Statues, and Chapters 62-4, 62-210 and 62-213, F.A.C.