# Florida Department of Environmental Protection

Central District
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803-3767

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard, Jr.
Secretary


*Electronically Sent- Received Receipt Requested*
**jrees@silverspringscitrus.com**

Mr. John Rees, President
Silver Springs Citrus, Inc.
P.O. Box 155
Howey-In-The-Hills, Florida 34737

Re: Project No. 0690014-011-AF
Silver Springs Citrus
Federally Enforceable State Operating Permit (FESOP)
Project: Initial FESOP

Dear Mr. Rees:

On December 16, 2010, you submitted an application requesting an initial FESOP as a result of the reduction of the facility's pollutant emissions to a level lower than the major thresholds of Title V permitting and therefore, no longer needs a Title V permit. This facility is located in Lake County at 25411 Mare Avenue in Howey-In-The-Hills, Florida. Enclosed are the following documents: the **Second Revised** Technical Evaluation and Preliminary Determination; the **Second Revised** Draft Permit and Appendices; the **Second Revised** Written Notice of Intent to Issue Air Permit; and the **Second Revised** Public Notice of Intent to Issue Air Permit. The Public Notice of Intent to Issue Air Permit is the actual notice that you must have published in the legal advertisement section of a newspaper of general circulation in the area affected by this project. If you have any questions, please contact the project engineer, Ms. Natrevia Gradney, at 407-893-3334, ext. 2369.

Sincerely,

Caroline D. Shine
District Air Program Administrator
Central District

Enclosures

CDS/ng/ta

# SECOND REVISED WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

*In the Matter of an*
*Application for Air Permit by:*

Silver Springs Citrus, Inc.
P.O. Box 155
Howey-In-The-Hills, Florida 34737

*Authorized Representative:*
Mr. John Rees, President

Project No. 0690014-011-AF
Federally Enforceable State
Operating Permit (FESOP)
Lake County, Florida

Silver Springs Citrus
Project: Initial FESOP

**Facility Location**: Silver Springs Citrus, Inc. operates the existing Silver Springs Citrus, which is located in Lake County at 25411 Mare Avenue in Howey-In-The-Hills, Florida, Florida.

**Project**: The purpose of this FESOP is to change the status of the facility to non-Title V. The facility's citrus peel dryer, the pellet cooler, the cooling reel, and the lime storage silo have been removed. The facility's emissions have been reduced by 76 percent. Details of the project are provided in the application and the enclosed Technical Evaluation and Preliminary Determination.

**Permitting Authority**: Applications for air construction and operation permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210, and 62-212 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Permitting Authority responsible for making a permit determination for this project is the Department of Environmental Protection's Air Resource Management Section in the Central District Office. The Permitting Authority's physical address is: 3319 Maguire Blvd., Ste. 232, Orlando, Florida 32803-3767. The Permitting Authority's mailing address is: 3319 Maguire Blvd., Ste. 232, Orlando, Florida 32803-3767. The Permitting Authority's telephone number is 407/893-3334.

**Project File**: A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at address indicated above for the Permitting Authority. The complete project file includes the Draft Permit, the Technical Evaluation and Preliminary Determination, the application, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Permitting Authority's project review engineer for additional information at the address or phone number listed above.

**Notice of Intent to Issue Permit**: The Permitting Authority gives notice of its intent to issue an air permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of the proposed equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C. The Permitting Authority will issue a Final Permit in accordance with the conditions of the proposed Draft Permit unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S. or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

**Public Notice**: Pursuant to Section 403.815, F.S. and Rules 62-110.106 and 62-210.350, F.A.C.,

you (the applicant) are required to publish at your own expense the enclosed Public Notice of Intent to Issue Air Permit (Public Notice). The Public Notice shall be published one time only as soon as possible in the legal advertisement section of a newspaper of general circulation in the area affected by this project. The newspaper used must meet the requirements of Sections 50.011 and 50.031, F.S. in the county where the activity is to take place. If you are uncertain that a newspaper meets these requirements, please contact the Permitting Authority at above address or phone number. Pursuant to Rule 62-110.106(5) and (9), F.A.C., the applicant shall provide proof of publication to the Permitting Authority at the above address within 7 days of publication. Failure to publish the notice and provide proof of publication may result in the denial of the permit pursuant to Rule 62-110.106(11), F.A.C.

**Comments**: The Permitting Authority will accept written comments concerning the proposed Draft Permit for a period of 14 days from the date of publication of the Public Notice. Written comments must be received by the Permitting Authority by close of business (5:00 p.m.) on or before the end of the 14-day period. If written comments received result in a significant change to the Draft Permit, the Permitting Authority shall revise the Draft Permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection.

**Petitions**: A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000 (Telephone: 850/245-2241). Petitions filed by the applicant or any of the parties listed below must be filed within 14 days of receipt of this Written Notice of Intent to Issue Air Permit. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within 14 days of publication of the attached Public Notice or within 14 days of receipt of this Written Notice of Intent to Issue Air Permit, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within 14 days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner; the name, address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of when and how each petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact. If there are none, the petition must so state; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the

agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this Written Notice of Intent to Issue Air Permit. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

**Mediation**: Mediation is not available in this proceeding.

Executed in Orange County, Florida.

Caroline D. Shine

Caroline D. Shine
District Air Program Administrator
Central District

## CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this **Second Revised** Written Notice of Intent to Issue Air Permit package (including the **Second Revised** Written Notice of Intent to Issue Air Permit, the **Second Revised** Public Notice of Intent to Issue Air Permit, the **Second Revised** Technical Evaluation and Preliminary Determination and the **Second Revised** Draft 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 March 15, 2011 to the persons listed below.

Mr. John Rees, President, Silver Springs Citrus, Inc. **(jrees@silverspringscitrus.com)**
Mr. Maxwell R. Lee, P.E., Koogler and Associates, Inc. **(mlee@kooglerassociates.com)**
Ms. Ana Oquendo, EPA Region 4 **(oquendo.ana@epamail.epa.gov)**
Ms. Barbara Friday, DEP BAR **(barbara.friday@dep.state.fl.us)**

Clerk Stamp

**FILING AND ACKNOWLEDGMENT FILED**, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.

(Clerk) 3/15/11 (Date)

# PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT

Florida Department of Environmental Protection
Air Resource Management, Central District Office
**Second Revised** Draft Federally Enforceable State Operation Permit (FESOP)
Project No. 0690014-011-AF
Silver Springs Citrus, Inc., Silver Springs Citrus
Lake County, Florida

**Applicant**: The applicant for this project is Silver Springs Citrus, Inc. The applicant's authorized representative and mailing address is:

Mr. John Rees, President
Silver Springs Citrus, Inc., Silver Springs Citrus
P.O. Box 155
Howey-In-The-Hills, Florida 34737

**Facility Location**: Silver Springs Citrus, Inc. operates the existing Silver Springs Citrus, which is located in Lake County at 25411 Mare Avenue in Howey-In-The-Hills, Florida.

**Project**: The purpose of this FESOP is to change the status of the facility to non-Title V. The facility's citrus peel dryer, the pellet cooler, the cooling reel, and the lime storage silo have been removed. The facility's emissions have been reduced by 76 percent.

**Permitting Authority**: Applications for air construction and operation permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210 and 62-212 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Permitting Authority responsible for making a permit determination for this project is the Department of Environmental Protection's Air Resource Management Section in the Central District Office. The Permitting Authority's physical address is: 3319 Maguire Blvd., Ste. 232, Orlando, FL 32803-3767. The Permitting Authority's mailing address is: 3319 Maguire Blvd., Ste. 232, Orlando, FL 32803-3767. The Permitting Authority's telephone number is 407/893-3334.

**Project File**: A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at the physical address indicated above for the Permitting Authority. The complete project file includes the Draft Permit, the Technical Evaluation and Preliminary Determination, the application and information submitted by the applicant (exclusive of confidential records under Section 403.111, F.S.). Interested persons may contact the Permitting Authority's project engineer for additional information at the address and phone number listed above. In addition, electronic copies of these documents are available on the following web site: http://www.dep.state.fl.us/air/emission/apds/default.asp.

**Notice of Intent to Issue Air Permit**: The Permitting Authority gives notice of its intent to issue an air Federally Enforceble State Operating permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of proposed equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297, F.A.C. The Permitting Authority will issue a Final Permit in accordance with the conditions of the proposed Draft Permit unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S. or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

**Comments**: The Permitting Authority will accept written comments concerning the proposed Draft Permit for a period of 14 days from the date of publication of this Public Notice. Written comments must be received by the Permitting Authority by close of business (5:00 p.m.) on or before the end of the 14-day period. If written comments received result in a significant change to the Draft Permit, the Permitting Authority shall revise the Draft Permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection.

**Petitions**: A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000 (Telephone: 850/245-2241). Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S. must be filed within 14 days of publication of this Public Notice or receipt of a written notice, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within 14 days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address and telephone number of the petitioner; the name address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial rights will be affected by the agency determination; (c) A statement of when and how the petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact. If there are none, the petition must so state; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this Public Notice of Intent to Issue Air Permit. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

**Mediation**: Mediation is not available for this proceeding.

# SECOND REVISED TECHNICAL EVALUATION
# &
# PRELIMINARY DETERMINATION

## APPLICANT

Silver Springs Citrus, Inc.
P.O. Box 155
Howey-In-The-Hills, Florida 34737

Silver Springs Citrus

Facility ID No. 0690014

## PROJECT

Project No. 0690014-011-AF
Application for Federally Enforceable State Operating Permit (FESOP)
Project Name: Initial FESOP

## COUNTY

Lake County, Florida

## PERMITTING AUTHORITY

Florida Department of Environmental Protection
Air Resource Management
Central District Office
3319 Maguire Blvd., Ste. 232, Orlando, FL 32803-3767

March 14 & 15, 2011

Prepared by Natrevia Gradney

## GENERAL PROJECT INFORMATION

### Air Pollution Regulations

Projects at stationary sources with the potential to emit air pollution are subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The statutes authorize the Department of Environmental Protection (Department) to establish regulations regarding air quality as part of the Florida Administrative Code (F.A.C.), which includes the following applicable chapters: 62-4 (Permits); 62-204 (Air Pollution Control - General Provisions); 62-210 (Stationary Sources - General Requirements); 62-212 (Stationary Sources - Preconstruction Review); 62-213 (Operation Permits for Major Sources of Air Pollution); 62-296 (Stationary Sources - Emission Standards); and 62-297 (Stationary Sources - Emissions Monitoring). Specifically, air construction permits are required pursuant to Rules 62-4, 62-210 and 62-212, F.A.C.

In addition, the U. S. Environmental Protection Agency (EPA) establishes air quality regulations in Title 40 of the Code of Federal Regulations (CFR). Part 60 specifies New Source Performance Standards (NSPS) for numerous industrial categories. Part 61 specifies National Emission Standards for Hazardous Air Pollutants (NESHAP) based on specific pollutants. Part 63 specifies NESHAP based on the Maximum Achievable Control Technology (MACT) for numerous industrial categories. The Department adopts these federal regulations on a quarterly basis in Rule 62-204.800, F.A.C.

### Glossary of Common Terms

Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of this permit.

I. Project Description:

A. Applicant:

Mr. John Rees, President
Silver Springs Citrus, Inc.
P.O. Box 155
Howey-In-The-Hills, Florida 34737

B. Professional Engineer:

Mr. Maxwell R. Lee, P.E.
Koogler and Associates, Inc.
4014 N.W. 13th Street
Gainesville, Florida 32609

C. Project Location:

Silver Springs Citrus
25411 Mare Avenue
Howey-In-The-Hills, Florida 34737

D. Project Summary:

The purpose of this project is to establish federally enforceable limitations on the facility and affected emissions units that will effectively change the status of the facility to non-TV. As a result of the removal of the facility's citrus peel dryer (EU 001), the pellet cooler (EU 005), the cooling reel (EU 006), and the lime storage silo (EU 008), the facility's overall pollutant emissions have been reduced by approximately 76 percent to a level significantly lower than the major thresholds of Title V permitting.

E. Application Information:

Application Received on: 12/16/2010
Additional Information Requested on: N/A
Additional Information Received on: N/A
Application Complete: 12/16/2010

II. PSD Applicability for Project

As provided in the application, the following table summarizes a decrease in emissions (facility) as a result of the removal of EU Nos. 001, 005, 006, 008 and PSD applicability for the project. For each pollutant, the baseline "actual" emissions (BAE) are the average annual emissions for the highest consecutive two years out of the last ten years.

**Table A. Actual Emissions (Tons/Year) and PSD Applicability**

| Pollutant | Baseline Actual Emissions – highest consecutive 2 yrs. average (tpy) | Projected Actual Emissions (tpy) | Total Project Emissions (tpy) | Significant Emissions Rate (tpy) | Subject to PSD? |
|---|---|---|---|---|---|
| PM | 18.277 | 0.0 | -18.277 | 25 | No |
| $PM_{10}$ | 17.743 | 0.0 | -17.743 | 15 | No |
| $SO_2$ | 0.021 | 0.0 | -0.021 | 40 | No |
| CO | 4.219 | 0.0 | -4.219 | 100 | No |
| NOx | 8.235 | 0.0 | -8.235 | 40 | No |
| VOC | 0.138 | 0.0 | -0.138 | 40 | No |

As shown in the above table, total project emissions will not exceed the PSD significant emissions rates; therefore, the project is **not** subject to PSD preconstruction review. A summary of the remaining emissions units is provided in Section IV., below, and the total potential to emit (PTE) of those units does not exceed the PSD major threshold of 250 tons/yr and therefore; the facility is no longer a PSD major stationary source.
*{Permitting Note: Future projects to increase emissions will be closely reviewed by the Permitting Authority to ensure that the facility did not circumvent PSD preconstruction review by purposely phasing the projects.}*

## III. Rule Applicability

This project is subject to the preconstruction review requirements of Chapter 403, Florida Statutes and Chapters 62-204 through 62-297, Florida Administrative Code (F.A.C.), as indicated below.

| Subject to: | Y/N | Comments |
|---|---|---|
| **Rule 62-210.300, F.A.C.** - Project Not Subject to Prevention of Significant Deterioration or Nonattainment Requirements, F.A.C. | Y | Not exempt from general permitting requirements. |
| **Rule 62-212.400, F.A.C.** - Prevention of Significant Deterioration | Y | Facility is no longer a PSD major stationary source; however, Rule 62-212.400(12)(Source Obligation), F.A.C. applies to this facility. |
| **Rule 62-296.320(4), F.A.C.** - General Particulate Emission Limiting Standards | Y | Facility is a source of unconfined particulate matter emissions. |
| **Rules 62-296.320(1) and (2), F.A.C.** - General Pollutant Emission Limiting Standards (VOCs and Odor) | Y | Facility is a source of VOCs and odor. |
| **Rule 62-296.400, F.A.C.** - Stationary Source Emission Standards | Y | EU Nos. 002, 007, and 009 are subject to 62-296.406, F.A.C. - Fossil Fuel Steam Generators with Less Than 250 Million Btu per Hour Heat Input, New and Existing Units. |
| **Rule 62-296.500, F.A.C.** - Reasonably Available Control Technology (VOC) | N | Lake County is an attainment area for ozone. |
| **Rule 62-296.700, F.A.C.** - Reasonably Available Control Technology (PM) | N | There is no applicable source category. |
| **Rule 62-204.800, F.A.C.** - Standards of Performance for New Stationary Sources (NSPS) | N | There is no applicable source category. |
| **Rule 62-204.800, F.A.C.** National Emission Standard for Hazardous Air Pollutants (NESHAPS - 40 CFR 61) | N | There is no applicable source category. |

| Subject to: | Y/N | Comments |
|---|---|---|
| **Rule 62-204.800, F.A.C.** National Emission Standard for Hazardous Air Pollutants for Source Categories a.k.a. MACT (NESHAPS – 40 CFR 63) | N | There is no applicable source category. |
| **Chapter 62-213, F.A.C.** - Operation Permits for Major Sources of Air Pollution | N | The facility's overall pollutant emissions have been reduced by 76 percent to a level significantly lower than the major thresholds of Title V permitting and therefore, no longer needs a Title V permit. |
| **Rule 62-297.310, F.A.C.** - General Compliance Test Requirements, F.A.C. | Y | VE testing is required for EU Nos. 002, 007, and 009. |

IV. Summary of Remaining Emissions

| Pollutant | EU No. and brief description | Potential Emissions* (tpy) | Allowable Emissions (tpy, opacity) |
|---|---|---|---|
| $PM/PM_{10}$ | 002- 1200 HP Johnston Boiler No. 3 | 3.07 | |
| | 007- 750 HP Hurst Boiler No. 1 | 2.19 | |
| | 009- 750 HP Johnson Boiler | 2.19 | |
| | **Total** | **7.45** | |
| $SO_2$ | 002- 1200 HP Boiler No. 3 | 20.60 | BACT Determination** |
| | 007- 750 HP Hurst Boiler No. 1 | 14.45 | |
| | 009- 750 HP Johnson Boiler | 14.45 | |
| | **Total** | **49.50** | |
| CO | 002- 1200 HP Boiler No. 3 | 18.40 | |
| | 007- 750 HP Hurst Boiler No. 1 | 11.80 | |
| | 009- 750 HP Johnson Boiler | 11.80 | |
| | **Total** | **42.00** | |
| NOx | 002- 1200 HP Boiler No. 3 | 29.00 | |
| | 007- 750 HP Hurst Boiler No. 1 | 20.00 | |
| | 009- 750 HP Johnson Boiler | 20.00 | |
| | **Total** | **69.00** | |
| VOC | 002- 1200 HP Boiler No. 3 | 0.30 | |
| | 007- 750 HP Hurst Boiler No. 1 | 0.20 | |
| | 009- 750 HP Johnson Boiler | 0.20 | |
| | **Total** | **0.70** | |
| VE | 002- 1200 HP Boiler No. 3 | | 20% |
| | 007- 750 HP Hurst Boiler No. 1 | | |
| | 009- 750 HP Johnson Boiler | | |

**Calculations based on AP-42, Table 1.3-1 emission factors.*
*** The applicant requests, as BACT for PM and SO2, firing only natural gas, propane, d-limonene, or No. 2 distillate fuel oil with a maximum sulfur content of 0.1 percent, by weight and an opacity limit of 20 percent.*

V. Federal NSPS and/or NESHAP Provisions

The manufacture dates of the facility's three small boilers predate the applicability date of the NSPS. Therefore, these boilers are not subject to the requirements of the NSPS, 40CFR60, Subpart Dc- *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units.*

The facility is not a major source of hazardous air pollutants, therefore, the MACT requirements of 40CFR63, Subpart DDDDD- *Industrial Commercial and Institutional Boilers and Process Heaters,* does not apply to the facility's boilers.

VI. Conclusions

The emission limits proposed by the applicant will meet all of the requirements of Chapters 62-204 through 297, F.A.C.

The General and Specific Conditions listed in the proposed permit (attached) will assure compliance with all the applicable requirements of Chapters 62-204 through 297, F.A.C.

VII. Preliminary Determination

The Department makes a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations as conditioned by the draft permit. This determination is based on a technical review of the complete application, reasonable assurances provided by the applicant, and the conditions specified in the draft permit. Additional details of this analysis may be obtained by contacting the project engineer at the Florida Department of Environmental Protection Air Resource Management, Central District, 3319 Maguire Blvd., Ste. 232, Orlando, FL 32803-3767.

Pursuant to Section 403.087, Florida Statutes and Section 62-4.070, Florida Administrative Code, the Department hereby gives notice of its intent to issue a permit to construct the aforementioned air pollution source in accordance with the draft permit and its conditions as stipulated (see attached).

# Florida Department of Environmental Protection

Central District
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803-3767

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr.
Secretary


*Electronically Sent- Received Receipt Requested*
**jrees@silverspringscitrus.com**

## SECOND REVISED DRAFT PERMIT

**PERMITTEE**

Silver Spring Citrus, Inc.
P.O. Box 155
Howey-In-The-Hills, Florida 34737

Authorized Representative:
Mr. John Rees, President

Air Permit No. 0690014-011-AF
Permit Expires: 03/30/2016
Site Name : Silver Springs Citrus
Federally Enforceable State Operating Permit (FESOP)
Project Name: Initial FESOP

This is the final air operation permit, which authorizes an initial FESOP as a result of the reduction of the facility's pollutant emissions to a level lower than the major thresholds of Title V permitting. The proposed work is conducted at Silver Springs Citrus (Standard Industrial Classification No. 2037). The facility is located in Lake County at 25411 Mare Avenue in Howey-In-The-Hills, Florida. The UTM coordinates are Zone 17, 423.85 km East, and 3176.35 km North.

This final permit is organized by the following sections:

Section 1. General Information

Section 2. Administrative Requirements

Section 3. Facility-wide and Emissions Unit Specific Conditions

Section 4. Appendices

Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 of this permit.

This air pollution permit is issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to conduct the proposed work in accordance with the conditions of this permit.

Upon issuance of this final permit, any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel (Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000) 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 must be filed within 30 days after this order is filed with the clerk of the Department.

Executed in Orange County, Florida

*DRAFT*

Caroline D. Shine — Effective Date
District Air Program Administrator
Central District

## CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Determination, the Final Permit and the Appendices) 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 _____ to the persons listed below.

Mr. John Rees, President, Silver Spring Citrus, Inc. **(jrees@silverspringscitrus.com)**
Mr. Qi Zhang, Koogler and Associates, Inc. **(qzhang@kooglerassociates.com)**
Mr. Maxwell R. Lee, P.E., Koogler and Associates, Inc. **(mlee@kooglerassociates.com)**
Ms. Ana Oquendo, EPA Region 4 **(oquendo.ana@epamail.epa.gov)**
Ms. Barbara Friday, DEP BAR **(barbara.friday@dep.state.fl.us)**

Clerk Stamp

**FILING AND ACKNOWLEDGMENT FILED**, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.

*DRAFT*

(Clerk) — (Date)

## FACILITY AND PROJECT DESCRIPTION

### Silver Springs Citrus

Silver Springs Citrus is a citrus processing facility that consists of three (3) process steam boilers. 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 emissions units.

The existing facility consists of the following emissions units.

| Facility ID No. 0690014 | |
|---|---|
| ID No. | Emission Unit Description |
| 002 | 1200 HP Process Steam Boiler #3 |
| 007 | 750 HP Hurst Boiler #1 |
| 009 | 750 HP Johnson Boiler |

### Project Description

The purpose of this FESOP is to establish federally enforceable limitations on the facility and affected emissions units that will effectively change the status of the facility to non-TV. As a result of the removal of the facility's citrus peel dryer (EU 001), the pellet cooler (EU 005), the cooling reel (EU 006), and the lime storage silo (EU 008), the facility's overall pollutant emissions have been reduced by 76 percent to a level significantly lower than the major thresholds of Title V permitting.

*NOTE: Please reference the Permit No., Facility ID, and Emission Unit ID in all correspondence, test report submittals, applications, etc.*

## FACILITY REGULATORY CLASSIFICATION

- The facility is not a major source of hazardous air pollutants (HAP).
- The facility has no units subject to the acid rain provisions of the Clean Air Act (CAA).
- The facility is not a Title V major source of air pollution in accordance with Chapter 213, F.A.C.; however, the facility was previously a Title V major source of air pollution.
- The facility is no longer a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C. due to the removal of EU Nos. 001, 005, 006, and 008

*{Permitting Note: Future projects to increase emissions will be closely reviewed by the Permitting Authority to ensure that the facility did not circumvent PSD preconstruction review by purposely phasing the projects.}*

## PERMIT HISTORY/AFFECTED PERMITS

Replaces Permit No. 0690014-010-AV

1. Permitting Authority: The permitting authority for this project is the Florida Department of Environmental Protection, Central District Air Resource Management Section. The Central District's mailing address and phone number is:

   Florida Department of Environmental Protection
   Central District Office
   Air Resource Management Section
   3319 Maguire Blvd., Ste. 232
   Orlando, FL 32803-3767 Telephone: 407-894-7555

   All documents related to applications for permits shall be submitted to the above address.

2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Central District Air Resource Management Section (see above mailing address and phone number) or Local Air Program Name. The mailing address and phone number of the Local Air Program is: Address and Phone Number.

3. Appendices: The following Appendices are attached as part of this permit:

   a. Appendix A. Citation Formats and Glossary of Common Terms;
   b. Appendix B. General Conditions;
   c. Appendix C. Common Conditions; and
   d. Appendix D. Common Testing Requirements.

4. Applicable Regulations, Forms and Application Procedures: Unless otherwise specified in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.

5. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time.
   [Rule 62-4.080, F.A.C.]

6. Modifications: Unless otherwise exempt by rule, the permittee shall not initiate any construction, reconstruction, or modification at the facility and shall not install/modify any pollution control device at the facility without obtaining prior authorization from the Department. Modification is defined as: Any physical change or changes in the method of operations or addition to a facility that would result in an increase in the actual emissions of any air pollutant subject to air regulations, including any not previously emitted, from any emission unit or facility.
   [Rules 62-210.200 - Definition of "Modification" and 62-210.300(1)(a), F.A.C.]

7. Operation Permit Renewal Application: A completed application for renewal of the operation permit shall be submitted to the Permitting Authority no later than 60 days prior to the expiration date of the operation permit. To properly apply for an operation permit, the applicant shall submit the following:

a. the appropriate permit application form *(see current version of Rule 62-210.900, F.A.C. (Forms and Instructions), and/or FDEP Division of Air Resource Management website at: http://www.dep.state.fl.us/air/)*;

b. the appropriate operation permit application fee from Rule 62-4.050(4)(a), F.A.C.;

c. copies of the most recent compliance test reports required by Facility-Wide Specific Condition No. A.11., if not previously submitted; and

d. copies of the most recent two months of records/logs specified in Facility-Wide Specific Condition No(s). A.21., A.22., and A.23.

[Rules 62-4.030, 62-4.050, 62-4.070(3), 62-4.090, 62-210.300(2), and 62-210.900, F.A.C.]

## A. Facility-Wide Specific Conditions

This section of the permit addresses the following emissions units.

| ID No. | Emission Unit Description |
|---|---|
| 002 | 1200 HP Process Steam Boiler #3 |
| 007 | 750 HP Hurst Boiler #1 |
| 009 | 750 HP Johnson Boiler |

### PERFORMANCE RESTRICTIONS

A.1. Permitted Capacity: The maximum operation heat input rate is as follows:

| Unit No. | MMBtu/hr Heat Input |
|---|---|
| 002 | 46.6 |
| 007 | 32.0 |
| 009 | 32.0 |

[Rules 62-210.200(PTE), 62-212.400 (12)(Source Obligation), and 62-296.406, F.A.C.; Construction Permit 0690014-009-AC]

A.2. Authorized Fuel: The boilers shall **only** fire the following fuels and shall be limited to a maximum sulfur content of 0.10 percent, by weight:

a. natural gas;

b. propane;

c. d-limonene; or

d. No. 2 distillate fuel oil.

[Rule 62-210.200 (PTE), F.A.C.; Construction Permit 0690014-009-AC]

A.3. Restricted Operation: The hours of operation are not limited (8760 hours per year). [Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]

### EMISSIONS STANDARDS

A.4. Visible Emissions (VE): Visible emissions shall not exceed 20 percent opacity, except for one six-minute period per hour during which opacity shall not exceed 27 percent. [Rule 62-296.406(1), F.A.C.; Construction Permit 0690014-009-AC]

A.5. Unconfined Particulate Matter (PM) Emissions: No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any activity, including vehicular movement; transportation of materials; construction, alteration, demolition or wrecking; or industrially related activities such as loading, unloading, storing or handling; without taking reasonable precautions to prevent such emissions. Reasonable precautions shall include, but are not limited to, the following:

a. Paved roadways; application of water to unpaved roads.
b. Landscaping or planting of vegetation.
c. Use of enclosures and windbreaks, where practical.

[Rule 62-296.320(4)(c), F.A.C.]

A.6. Particulate Matter (PM): Particulate matter emissions shall be controlled by firing only natural gas; propane; d-limonene; or No. 2 distillate fuel oil with a maximum sulfur content of 0.10 percent, by weight.
[Rule 62-296. 406(2), F.A.C.; Construction Permit 0690014-009-AC]

A.7. Sulfur Dioxide ($SO_2$): Sulfur dioxide emissions shall be controlled by firing only natural gas; propane; d-limonene; or No. 2 distillate fuel oil with a maximum sulfur content of 0.10 percent, by weight.
[Rule 62-296. 406(3), F.A.C.; Construction Permit 0690014-009-AC]

## EXCESS EMISSIONS

A.8. Excess Emissions (Malfunction): Excess emissions resulting from malfunction of any emissions unit shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration.
[Rule 62-210.700(1), F.A.C.]

A.9. Excess Emissions (Startup/Shutdown): Excess emissions from existing fossil fuel steam generators resulting from startup or shutdown shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized.
[Rule 62-210.700(2), F.A.C.]

A.10. Excess Emissions (Operation & Maintenance): Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown, or malfunction shall be prohibited.
[Rule 62-210.700(4), F.A.C.]

## TESTING REQUIREMENTS

A.11. Compliance Tests: During each federal fiscal year (October 1st to September 30th), the emissions unit shall be tested to demonstrate compliance with the emissions standards for visible emissions specified in Facility-Wide Specific Condition A.4.
[Rule 62-297.310, F.A.C.]

A.12. Test Requirements: Tests shall be conducted in accordance with the applicable requirements specified in Appendix D (Common Testing Requirements) of this permit.
[Rule 62-297.310, F.A.C.]

A.13. Test Method: Required tests shall be performed in accordance with the following reference method(s).

| EPA Method | Description of Method and Comments |
|---|---|
| 9 | Visual Determination of the Opacity of Emissions from Stationary Sources |

The above method is described and adopted by reference in Rule 62-204.800, F.A.C. No other method(s) may be used unless prior written approval is received from the Department.
[Rules 62-204.800 and 62-297.100, F.A.C.]

A.14. Particulate Matter: Compliance with the particulate matter standard is demonstrated by firing only natural gas; propane; d-limonene; or, No. 2 distillate fuel oil with a maximum 0.10 percent sulfur, by weight.
[Rule 62-296. 406(2), F.A.C.; Construction Permit 0690014-009-AC]

A.15. Sulfur Dioxide: The permittee elected to demonstrate compliance by accepting a liquid fuel sulfur limit for fuel oil that will be verified with a fuel analysis provided by the vendor or the permittee upon each fuel delivery. This protocol is allowed because the emissions unit does not have an operating flue gas desulfurization device.
[Rule 62-296.406(3), F.A.C.; Construction Permit 0690014-009-AC]

A.16. Fuel Sulfur Content: The fuel sulfur content, percent by weight, for fuel oil shall be evaluated using either ASTM D2622-92, ASTM D4294-90, both ASTM D4057-88 and ASTM D129-91, or the latest edition.
[Rules 62-213.440 and 62-297.440, F.A.C.; Construction Permit 0690014-009-AC]

A.17. Operating Rate During Testing. Testing of emissions shall be conducted with the emissions unit operation at permitted capacity, which is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impracticable to test at permitted capacity, an emissions unit may be tested at less than the minimum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test load until a new test is conducted. Once the emissions unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity.
[Rules 62-297.310(2) & (2)(b), F.A.C.; Construction Permit 0690014-009-AC]

## NOTIFICATION REQUIREMENTS

A.18. Test Notification: The permittee shall notify the Compliance Authority, at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the permittee.
[Rules 62-4.070(3) and 62-297.310(7)(a)9., F.A.C.]

## RECORDS AND REPORTS

A.19. Test Reports: The permittee shall prepare and submit reports for all required tests in accordance with the requirements specified in Appendix D (Common Testing Requirements) of this permit.
[Rule 62-297.310(8), F.A.C.]

A.20. Excess Emissions Reporting: In case of excess emissions resulting from malfunctions, each owner or operator shall notify the Department or the appropriate Local Program in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department.
[Rules 62-4.070(3) and 62-210.700(6), F.A.C.]

A.21. Fuel Sulfur Content Records: The permittee shall keep records of all fuel analysis provided by the vendor or the permittee verifying the liquid fuel sulfur content upon each fuel oil delivery. Fuel records shall also be kept relating to General Condition No. 14.c. in Appendix B (General Conditions).
[Rules 62-4.070(3) and 62-296.406(3), F.A.C.]

A.22. Daily Log: In order to provide information to document compliance with the fuel heat input rate limitations of Facility-Wide Specific Condition No. A.1., the permittee shall monitor and maintain daily record logs of the amount of each fuel used and the hours of operation. The logs shall be kept at the facility for a period of five years and shall be made available to the Department upon request.
[Rules 62-4.070(3), F.A.C.; Construction Permit 0690014-009-AC]

A.23. Monthly Log: In order to document continuing compliance with Specific Condition No. A.1., the following records shall be kept monthly:

a. Facility name, Facility ID No., Emission Unit ID No. and Description (i.e., EU 002, 1200 HP Process Steam Boiler #3);

b. Month/Year of record;

c. Consecutive twelve months total of the amount of each fuel used; and

d. Consecutive twelve months total of operational hours.
[Rule 62-4.070(3), F.A.C.]

Note: A consecutive 12 months total is equal to the total for the month in question plus the totals for the eleven months previous to the month in question. A consecutive 12-months total treats each month of the year as the end of a 12-months period. A 12-months total is not a year-to-date total. Facilities that have not been operating for 12 months should retain 12 months totals using whatever number of months of data are available until such a time as a consecutive 12 months total can be maintained each month. **The monthly logs shall be completed by the end of the following month.** All records shall be recorded in a permanent form suitable for inspection by the Department upon request and shall be kept at the facility for a minimum of the most recent five (5) year period. [Rule 62-4.070(3), F.A.C.]

## BEST MANAGEMENT PRACTICES

A.24. Best Management Practices for Carbon Monoxide (CO): The facility shall operate its boilers in accordance with the manufacturer's operating manual, or recommended operating practices provided by the manufacturer, equipment vendor, or a professional engineer registered in Florida, as well as with the practices described in this paragraph. The facility shall report to the Department any failure to follow these practices, and shall make such report in writing within 7 days from discovery of such failure. Records and copies of reports shall be maintained on site for a period of five years and shall be made available to the Department upon request. The facility shall:

a. Train boiler operators to perform the operating practices of this paragraph using the manuals and plans described, and allow only trained employees to operate boilers;
b. Maintain a written plan with operating procedures for startup, shutdown and malfunction of the equipment, and follow that plan during these events;
c. Operate and maintain the burner and burner controls to maintain a proper air to fuel ratio;
d. Visually check the flame characteristics once per operating shift;
e. Make burner and burner control adjustments on an annual basis, or more frequently as required by visual checks;
f. Perform an inspection of combustion equipment as prescribed by the equipment manufacturer or registered professional engineer, but no less often than annually, and replace parts that are worn or improperly operating;
g. Keep records of combustion operations that document the operating practices described in this paragraph, such documentation shall include a manual, which can be the manufacturer's operation manual, and daily logs; and
h. Document maintenance performed on equipment, and all normal processing equipment and operating practices changes.

[Rule 62-4.070(3), F.A.C.]