Florida Department of Environmental Protection

Southwest District Office
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr.
Secretary

DRAFT PERMIT

PERMITTEE

Citrosuco North America, Inc.
5937 Hwy 60 East
Lake Wales, FL 33898

Authorized Representative:
Mr. Nicholas Emanuel, President

Air Permit No. 1050001-013-AC
Permit Expires: 06/30/2012
Site Name: Citrosuco North America, Inc.
Minor Air Construction Permit
Project Name: Construction Permit Modification

This is the final air construction permit, which modifies construction permit 1050001-010-AC by: removing the previously regulated 125 HP Boiler (moving it into the insignificant source category); replacing the individual maximum heat input limitations for the three regulated boilers with a combined maximum heat input limitation of 153.85 mmBtu/hr; reducing the particulate matter emissions testing frequency for the two pellet coolers from annually to once every five years (prior to renewal); eliminating the PM/PM_{10} recordkeeping for the two pellet coolers; and modifying the method of operation for the two dryers and three boilers by specifying that the No. 2 distillate fuel oil can only be burned during periods of gas curtailment. This citrus processing facility (Standard Industrial Classification No. 2033) is located in Polk County at 5937 Hwy 60 East in Lake Wales, Florida. The UTM coordinates are Zone 17, 451.7 km East, and 3085.8 km North. As noted in the Final Determination provided with this final permit, no changes or only minor changes and clarifications were made to the draft permit.

This final permit is organized by the following sections:

Section 1. General Information

Section 2. Administrative Requirements and Facility-wide Specific Conditions

Section 3. 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. This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

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 Hillsborough County, Florida
DRAFT

_____ _____

Cindy Zhang-Torres, P.E. Effective Date
Air Permitting Manager
Southwest 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. Nicholas Emanuel
Citrosuco North America
nemanuel@citrosuco.com

Ms. Lisa Taylor
Citrosuco North America
ltaylor@citrosuco.com

Mr. Wayne Griffin
G2 Services
G2Services@aol.com

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

Citrosuco North America, Inc.

This facility processes up to 32 million boxes of citrus into various citrus products and animal feed. The existing facility consists of the following emissions units.

Facility ID No. 1050001	
ID No.	Emissions Unit Description
001	800 Horsepower Boiler
006	Citrus Peel Dryer No. 2
007	Citrus Peel Dryer No. 3
008	2,000 Horsepower Boiler
009	Pellet Cooler No. 2
010	Pellet Cooler No. 3
012	1,000 Horsepower Boiler
014	125 Horsepower Boiler

Project Description and Affected Emission Units

In the Title V Air Operation Permit Renewal application submitted to the Department on February 21, 2011, the permittee requested that the following changes be made: move the regulated 125 Horsepower Boiler (Emissions Unit 014) to the insignificant source category; replace individual maximum heat input limitations for 800 Horsepower Boiler (Emissions Unit 001), 2,000 Horsepower Boiler (Emissions Unit 008), and 1,000 Horsepower Boiler (Emissions Unit 012) with a combined maximum heat input limitation of 153.85 mmBtu/hr; and reduce particulate matter emissions testing frequency for Pellet Coolers 2 and 3 (Emissions Units 009 and 010) from annually to once per permit period (prior to renewal). PM/PM_{10} recordkeeping for the two pellet coolers (Emissions Units 009 and 010) is also being removed as a part of this project. In e-mails sent to the Department on May 24 and May 25, 2011, the permittee also requested that the method of operation be modified for the two dryers (Emissions Units 006 and 007) and three boilers (Emissions Units 001, 008, and 012) by specifying that the No. 2 distillate fuel oil can only be burned during periods of gas curtailment.

This project will modify the following emissions units.

Facility ID No. 1050001	
ID No.	Emissions Unit Description
001	800 Horsepower Boiler
006	Citrus Peel Dryer No. 2
007	Citrus Peel Dryer No. 3
008	2,000 Horsepower Boiler
009	Pellet Cooler No. 2
010	Pellet Cooler No. 3
012	1,000 Horsepower Boiler

This project will remove the following emissions unit from the list of regulated emissions units.

Facility ID No. 1050001	
ID No.	Emissions Unit Description
014	125 Horsepower Boiler

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 a Title V major source of air pollution in accordance with Chapter 62-213, F.A.C.
- The facility is a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.
- This facility is subject to NSPS 40 CFR 60 Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units), as adopted by reference in Rule 62-204.800(8)(b), F.A.C.; NESHAP 40 CFR 63 Subpart ZZZZ (National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines), as adopted by reference in Rule 62-204.800(11)(b), F.A.C.; as well as Subpart A General Provisions for both 40 CFR 60 and 40 CFR 63.

PERMIT HISTORY/AFFECTED PERMITS

Modifies and replaces Construction Permit No. 1050001-010-AC.

SECTION 2. ADMINISTRATIVE REQUIREMENTS AND FACILITY-WIDE SPECIFIC CONDITIONS (DRAFT)

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

   Florida Department of Environmental Protection
   Southwest District Office
   Air Resource Management Section
   13051 North Telecom Parkway
   Temple Terrace, Florida 33637-0926
   Telephone: 813-632-7600

   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 Southwest District Office's Air Resource Management Section (see above mailing 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. Annual Operating Report: On or before **April 1** of each year, the permittee shall submit a completed DEP Form 62-210.900(5), "Annual Operating Report for Air Pollutant Emitting Facility" (AOR) for the preceding calendar year. The report may be submitted electronically in accordance with the instructions received with the AOR package sent by the Department, or a hardcopy may be sent to the Compliance Authority.
   [Rule 62-210.370(3), F.A.C.]

8. Fruit Throughput Limit: The owner or operator shall not process more than 32.0 million boxes of citrus fruit in any consecutive 12 month period. For purposes of this permit, a box of citrus fruit shall be defined to contain 90 pounds of oranges or 85 pounds of grapefruit. The owner or operator shall make and maintain monthly and rolling 12 month records of fruit processing rates to demonstrate compliance with this limitation. Such records shall be made from daily processing records and shall be completed no later than the 10th day of each following month. [Rule 62-4.070(3), F.A.C.; Construction Permit 1050001-010-AC]

   {Permitting Note: Throughput limit was requested in air construction permit application received on 09/30/05}

9. VOC Emission Limits and Oil Recovery: VOC emissions will be limited by achieving a **72 percent recovery** of oil from citrus fruits processed each calendar year. Compliance with the emission limit for VOC shall be demonstrated by calculating the compliance indicator, as follows. All measured quantities of oil used in Equations 1 and 2 shall be in units of tons and the total results of the selected equation shall reflect the sum total for the entire calendar year.

   a. The facility may use either Equation 1 or 2 to demonstrate compliance, provided that the facility has maintained the necessary records to use that equation. In the case of Equation 2, all recovered oil must be actually measured and all emitted volatilized oil must be treated as emissions and not as reductions of peel oil. If the result of the selected equation is positive or zero, the facility is in compliance with the VOC emission limit. If the result of the selected equation is negative, the facility is in violation of the VOC emission limit. The facility may use either equation to demonstrate compliance, even if the other equation results in a negative compliance indicator.

   b. Facilities may accept wet peel from, or send wet peel to another facility for further processing and drying, provided that each facility involved receives or provides, respectively, sufficient recorded information to account for the recovery of oil from such peel, including oil in products and by-products at the receiving facility. A facility that sends wet peel offsite for any purpose shall not include the related oil in products and by-products in its oil recovery calculations. Such oil shall be included in the oil recovery calculations of the receiving facility. In any case, oil in products and by-products related to peel that is not processed through a peel dryer shall be excluded from all oil recovery calculations.

   Equation 1:
   Compliance Indicator = OIF(1 – K1) – OPP + ODP

   Equation 2:
   Compliance Indicator = OJ + CPO + EO + DL + ODP – K1(OIF)

   Where:
   K1 = 0.72.

   And the following are all in units of tons:
   OIF = Oil in Incoming Fruit
   ODP = Oil in Dried Pellets
   OPP = Oil in Pressed Peel
   OJ = Oil in Juice
   CPO = Cold Press Oil
   EO = Essence Oil

DL = d-limonene

Fruit and byproduct oil quantities, required for equations 1 and 2, as applicable, shall be measured daily. All peel oil recovery at a facility shall be determined using the same methodology at all times during each processing year. The following sampling and analytical methods shall be used for determining oil contents of fruit, pressed peel, dried peel and pellets: The sampling and analytical method for determining oil content in incoming whole fruit is the method documented in "FMC FoodTech Citrus Systems Division, Procedures for Analysis of Citrus Products, Chapter VI, Procedure 1. Whole Fruit Available Oil, FMC Technologies Inc., Lakeland, FL, pp. 119 to 123, (effective August 16, 2002)" hereby adopted by reference; the analytical method for determining oil content is the Scott Method (Bromate Titration Method) as documented in "FMC FoodTech Citrus Systems Division, Procedures for Analysis of Citrus Products, Chapter IV, Procedure 10. Recoverable Oil (Scott Method), FMC Technologies Inc., Lakeland, FL, pp. 40 to 44, (effective August 16, 2002)" hereby adopted by reference; the methods for sampling, sample preparation and analytical calculations for peel residue, press cake, and pellets are those documented in "Braddock, R. J. (1999), Handbook of Citrus By- Products and Processing Technology, Section 12.3.1.2 Analysis, John Wiley & Sons, NY, pp. 180 to 181," hereby adopted by reference. Copies of these documents may be obtained by contacting the Division of Air Resource Management at 2600 Blair Stone Road, Mail Station 5500, Tallahassee, FL 32399-2400.

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

{Permitting Note: Oil recovery percentage was requested in air construction permit application received on 09/30/05}

*(**Facility Title V Air Operation Permit Renewal Note**: On February 21, 2011, the facility submitted an application for renewal of its Title V Air Operation Permit (project No. 1050001-012-AV). The changes requested in this application initiated project No. 1050001-013-AC, and are incorporated into operation permit No. 1050001-012-AV.)*

A. EU No. 006 – Citrus Peel Dryer No. 2 and EU No. 007 – Citrus Peel Dryer No. 3

This section of the permit addresses the following emissions units.

ID No.	Emission Unit Description
006 007	The two (2) 60,000 pounds per hour (water removal rate) pressed citrus peel dryers (Citrus Peel Dryer Nos. 2 and 3) each have a maximum input rate of 50.0 tons per hour of pressed peel (including water). Each peel dryer has a maximum heat input rate of 93.6 million Btu per hour. The exhaust gases from the peel dryers are sent to the 60,000 pounds/hour, 120,000 pounds/hour, or 100,000 pounds/hour (water removal capacity) waste heat evaporators, which function as indirect heat exchangers to drive moisture from the press liquor (from the horizontal peel presses). The waste heat evaporators also reduce particulate matter emissions. Each peel dryer can be connected to any of the three waste heat evaporators.

PERFORMANCE RESTRICTIONS

A.1. Permitted Capacity: The maximum heat input rate for each dryer shall not exceed 93.6 million Btu per hour, daily average.
[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

A.2. Authorized Fuel(s): Natural gas shall be fired in these units. No. 2 distillate fuel oil with a maximum of 0.10 percent sulfur, by weight, can be fired only during periods of gas curtailment.
[Rules 62-210.200(PTE), F.A.C.]

{Permitting Note: Requested in electronic mail received on 05/24/11}

A.3. Hours of Operation: These emissions units are allowed to operate, as necessary, to process 32.0 million boxes of citrus fruit in any consecutive 12-month period.
[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

{Permitting Note: For emission calculations, the operation of each of these emissions units is estimated not to exceed 4,500 hours per year.}

EMISSIONS STANDARDS

A.4. Visible Emissions: Visible emissions from each dryer shall not exceed 20 percent opacity.
[Construction Permit 1050001-010-AC]

{Permitting Note: The limit was requested in air construction permit application received on 09/30/05}

A.5. Particulate Matter: The total PM/PM_{10} emissions from both dryers shall not exceed 26.0 pounds per hour and 58.5 tons in any consecutive 12-month period.
[Rule 62-212.400(12); Construction Permit 1050001-010-AC]

{Permitting Note: The limits were requested in air construction permit application received on 09/30/05}

A.6. Sulfur Dioxide: Sulfur dioxide emissions shall be limited by firing natural gas. No. 2 distillate fuel oil with a maximum of 0.10 percent sulfur, by weight, can be fired only during periods of gas curtailment. Measurement of the sulfur content of fuel oil shall be by latest American Society for Testing and Materials methods suitable for determining sulfur content. Sulfur dioxide emissions shall be determined by material balance using the sulfur content and

amount of the fuel or fuels fired in each emission source, assuming that for each pound of sulfur in the fuel fired, 2 pounds of sulfur dioxide are emitted. (*See Specific Condition A.10.*)
[Construction Permit 1050001-010-AC]

{Permitting Note: Requested in air construction permit application received on 09/30/05 and electronic mail received on 05/25/11}

TESTING REQUIREMENTS

A.7. Annual Compliance Tests Required: During each federal fiscal year (October 1st to September 30th), each dryer shall be tested to demonstrate compliance with the emissions standards for particulate matter and visible emissions.
[Rule 62-297.310(7), F.A.C.]

{Permitting Note: The permittee may request a reduction in test frequency following five consecutive tests showing compliance with the combined PM/PM_{10} hourly limit of Specific Condition A.5.}

A.8. 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.9. Test Methods: Required tests shall be performed in accordance with the following reference methods.

Method(s)	Description of Method and Comments
1-4	Traverse Points, Velocity and Flow Rate, Gas Analysis, and Moisture Content
5	Determination of Particulate Matter Emissions from Stationary Sources
9	Visual Determination of the Opacity of Emissions from Stationary Sources

The above methods are described in Appendix A of 40 CFR 60 and are 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.; and Appendix A of 40 CFR 60]

MONITORING REQUIREMENTS

A.10. Fuel Sulfur Monitoring: The permittee has elected to demonstrate compliance by accepting a liquid fuel sulfur limit 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. The fuel sulfur content, percent by weight, shall be evaluated using either ASTM D2622-92, ASTM D4294-90, both ASTM D4057-88 and ASTM D129-91, or the latest edition.
[Rule 62-297.440, F.A.C.; Construction Permit 1050001-010-AC]

{Permitting Note: Requested in air construction permit application received on 09/30/05}

NOTIFICATION REQUIREMENTS

A.11. Test Notification: The permittee shall notify the Compliance Authority in writing at least 15 days prior to any required tests. The notification must include the following information: the date, time, and location of each test; the name and telephone number of the facility's contact

person who will be responsible for coordinating the test; and the name, company, and the telephone number of the person conducting the test.

{*Permitting Note: The notification should also include the relevant emission unit ID No(s)., test method(s) to be used, and pollutants to be tested.*}

[Rules 62-4.070(3) and 62-297.310(7)(a)9., F.A.C.]

RECORDS AND REPORTS

A.12. 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.13. 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 delivery.
[Rule 62-4.070(3), F.A.C.; Construction Permit 1050001-010-AC]

A.14. Heat Input Recordkeeping: In order to provide information to document compliance with the fuel heat input rate limitation of Specific Condition 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 maintained on file and shall be made available to the Department upon request.
[Rule 62-4.070(3), F.A.C.; Construction Permit 1050001-010-AC]

A.15. PM/PM_{10} Recordkeeping: In order to document compliance with specific condition A.5., the owner or operator shall make and maintain monthly and rolling 12-month records of particulate emissions to demonstrate compliance with this limitation, based on the most recent stack test results multiplied by the hours of operation each month. The records shall be maintained on file and shall be made available to the Department upon request.
[Rule 62-4.070(3), F.A.C.; Construction Permit 1050001-010-AC]

OTHER REQUIREMENTS

A.16. Best Management Practices for Carbon Monoxide: The facility shall operate its citrus peel dryers 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 dryer operators to perform the operating practices of this paragraph using the manuals and plans described, and allow only trained employees to operate dryers;
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. Monitor the moisture content of the dried peel exiting the dryer on a daily basis, and maintain that moisture content greater than six percent by weight at all times during operation;

f. Make burner and burner control adjustments on an annual basis, or more frequently as required by visual checks;

g. 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;

h. 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

i. Document maintenance performed on equipment, and all normal processing equipment and operating practices changes.

[Rule 62-4.070(3), F.A.C.; Construction Permit 1050001-010-AC]

B. EU No. 009 – Pellet Cooler No. 2 and EU No. 010 – Pellet Cooler No. 3

This section of the permit addresses the following emissions units.

ID No.	Emission Unit Description
009 010	The two citrus peel pellet coolers (Pellet Coolers Nos. 2 and 3) each have a maximum rated capacity of 24.0 tons per hour. Dried citrus peel from peel dryers is sent to the pellet mill where molasses is added and pellets formed for use as an animal feed supplement. Pellets are then sent to the pellet coolers. Cyclone dust collectors (8,000 acfm each) are used to return any suspended product to the mill for reprocessing.

PERFORMANCE RESTRICTIONS

B.1. Permitted Capacity: The capacity of the pellet coolers are determined by the capacity of the citrus peel dryers.
[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; Construction Permit 1050001-010-AC]

{Permitting Note: The pellet cooler inputs are equal to the output of dried peel from the peel dryers.}

B.2. Hours of Operation: These emissions units are allowed to operate, as necessary, to process 32.0 million boxes of citrus fruit in any consecutive 12-month period.
[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; Construction Permit 1050001-010-AC]

{Permitting Note: For emission calculations, the operation of each of these emissions units is estimated not to exceed 4,500 hours per year.}

EMISSIONS STANDARDS

B.3. Visible Emissions: Visible emissions from each pellet cooler shall not exceed 5 percent opacity.
[Construction Permit 1050001-010-AC]

{Permitting Note: The limit was requested in air construction permit application received on 09/30/05}

B.4. Particulate Matter: The total PM/PM_{10} emissions from both pellet coolers shall not exceed 1.0 pounds per hour and 2.25 tons in any consecutive 12-month period.
[Rule 62-212.400(12); Construction Permit 1050001-010-AC]

{Permitting Note: The limits were requested in air construction permit application received on 09/30/05}

TESTING REQUIREMENTS

B.5. Annual Compliance Tests Required: During each federal fiscal year (October 1st to September 30th), each pellet cooler shall be tested to demonstrate compliance with the emissions standards for visible emissions.
[Rule 62-297.310(7), F.A.C.]

B.6. Compliance Tests Prior To Renewal: Compliance tests shall be performed for particulate matter emissions from each pellet cooler prior to renewing the facility's operation permit.
[Rules 62-210.300(2)(a) and 62-297.310(7)(a), F.A.C.]

{Permitting Note: The test frequency was requested in air construction permit application received on 02/21/11}

B.7. 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.]

B.8. Test Methods: Required tests shall be performed in accordance with the following reference methods.

Method(s)	Description of Method and Comments
1-4	Traverse Points, Velocity and Flow Rate, Gas Analysis, and Moisture Content
5	Determination of Particulate Matter Emissions from Stationary Sources
9	Visual Determination of the Opacity of Emissions from Stationary Sources

The above methods are described in Appendix A of 40 CFR 60 and are 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.; and Appendix A of 40 CFR 60]

NOTIFICATION REQUIREMENTS

B.9. Test Notification: The permittee shall notify the Compliance Authority in writing at least 15 days prior to any required tests. The notification must include the following information: the date, time, and location of each test; the name and telephone number of the facility's contact person who will be responsible for coordinating the test; and the name, company, and the telephone number of the person conducting the test.

{Permitting Note: The notification should also include the relevant emission unit ID No(s)., test method(s) to be used, and pollutants to be tested.}

[Rules 62-4.070(3) and 62-297.310(7)(a)9., F.A.C.]

RECORDS AND REPORTS

B.10. 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.]

C. EU No. 001 – 800 Horsepower Boiler, EU No. 008 – 2,000 Horsepower Boiler, and EU No. 012 – 1,000 Horsepower Boiler

This section of the permit addresses the following emissions units.

ID No.	Emission Unit Description
001	The high efficiency 800 Horsepower Boiler is a Johnston 509 steam boiler with a maximum heat input of 31.0 million Btu per hour. The boiler was placed into service January 1, 1985.
008	The 2,000 Horsepower Boiler is a Johnston 509 steam boiler with a maximum heat input of 84.35 million Btu per hour. The boiler was placed into service March 15, 2000.
012	The 1,000 Horsepower Boiler is a Johnston 509 steam boiler with a maximum heat input of 38.5 million Btu per hour. The boiler was placed into service January 1, 2002.

PERFORMANCE RESTRICTIONS

C.1. Federal Regulatory Requirements: Emissions Unit Nos. 008 and 012 are subject to 40 CFR 60 Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units), as adopted by reference in Rule 62-204.800(8)(b), F.A.C.; as well as Subpart A (General Provisions) for 40 CFR 60, adopted by reference in Rule 62-204.800(8)(d), F.A.C. [Rule 62-204.800(8), F.A.C.]

C.2. Permitted Capacity: The combined maximum allowable heat input rate for all three boilers shall not exceed 153.85 million Btu per hour, daily average.
[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

{Permitting Note: The combined rate was requested in air construction permit application received on 02/21/11}

C.3. Authorized Fuel(s): Natural gas shall be fired in these units. No. 2 distillate fuel oil with a maximum of 0.10 percent sulfur, by weight, can be fired only during periods of gas curtailment.
[Rules 62-210.200(PTE), F.A.C.; Construction Permit 1050001-010-AC]

{Permitting Note: Requested in electronic mail received on 05/24/11}

C.4. Hours of Operation: The hours of operation are not limited (i.e., 8,760 hours per year).
[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; Construction Permit 1050001-010-AC]

EMISSIONS STANDARDS

C.5. Visible Emissions: 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.]

C.6. Particulate Matter: Particulate matter shall be limited by firing natural gas. No. 2 distillate fuel oil with a maximum of 0.10 percent sulfur, by weight, can be fired only during periods of gas curtailment.
[Rule 62-296.406(2), F.A.C.; Construction Permit 1050001-010-AC]

{Permitting Note: Requested in air construction permit application received on 09/30/05 and electronic mail received on 05/24/11}

C.7. Sulfur Dioxide: Sulfur dioxide shall be limited by firing natural gas. No. 2 distillate fuel oil with a maximum of 0.10 percent sulfur, by weight, can be fired only during periods of gas curtailment. Measurement of the sulfur content of fuel oil shall be by latest American Society for Testing and Materials methods suitable for determining sulfur content. Sulfur dioxide emissions shall be determined by material balance using the sulfur content and amount of the fuel or fuels fired in each emission source, assuming that for each pound of sulfur in the fuel fired, 2 pounds of sulfur dioxide are emitted. (*See Specific Condition C.11.*)
[Rule 62-296.406(3), F.A.C.; Construction Permit 1050001-010-AC]

{Permitting Note: Requested in air construction permit application received on 09/30/05 and electronic mail received on 05/24/11}

TESTING REQUIREMENTS

C.8. Annual Compliance Tests Required: During each federal fiscal year (October 1st to September 30th), each boiler shall be tested to demonstrate compliance with the emissions standards for visible emissions.
[Rule 62-297.310(7), F.A.C.]

C.9. 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.]

C.10. Test Method: Required tests shall be performed in accordance with the following reference method.

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

The above method is described in Appendix A of 40 CFR 60 and is 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.; Appendix A of 40 CFR 60]

MONITORING REQUIREMENTS

C.11. Fuel Sulfur Monitoring: The permittee has elected to demonstrate compliance by accepting a liquid fuel sulfur limit 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. The fuel sulfur content, percent by weight, shall be evaluated using either ASTM D2622-92, ASTM D4294-90, both ASTM D4057-88 and ASTM D129-91, or the latest edition.
[Rules 62-296.406(3) and 62-297.440, F.A.C.; Construction Permit 1050001-010-AC]

{Permitting Note: Requested in air construction permit application received on 09/30/05}

NOTIFICATION REQUIREMENTS

C.12. Test Notification: The permittee shall notify the Compliance Authority in writing at least 15 days prior to any required tests. The notification must include the following information: the date, time, and location of each test; the name and telephone number of the facility's contact

person who will be responsible for coordinating the test; and the name, company, and the telephone number of the person conducting the test.

{Permitting Note: The notification should also include the relevant emission unit ID No(s)., test method(s) to be used, and pollutants to be tested.}

[Rules 62-4.070(3) and 62-297.310(7)(a)9., F.A.C.]

RECORDS AND REPORTS

C.13. 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.]

C.14. 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 delivery.
[Rule 62-4.070(3), F.A.C.; Construction Permit 1050001-010-AC]

C.15. Heat Input Recordkeeping: In order to provide information to document compliance with the boiler heat input rate limitations of Specific Condition C.2., 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 maintained on file and shall be made available to the Department upon request.
[Rule 62-4.070(3), F.A.C.; Construction Permit 1050001-010-AC]

OTHER REQUIREMENTS

C.16. Best Management Practices for Carbon Monoxide: 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;
g. 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;

h. 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

i. Document maintenance performed on equipment, and all normal processing equipment and operating practices changes.

[Rule 62-4.070(3), F.A.C.; Construction Permit 1050001-010-AC]