



Florida Department of Environmental Protection

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

Rick Scott
Governor

Carlos Lopez-Cantera
Lt. Governor

Jonathan P. Steverson
Secretary

PERMITTEE

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

Air Permit No. 1050001- 015-AC
Permit Expires: 12/31/2016
Minor Air Construction Permit

Authorized Representative:
Mr. Nicholas Emanuel, President

Revisions to Best Management
Practices for Carbon Monoxide
(CO)

PROJECT

This is the final air construction permit, which revises Permit No. 1050001-013-AC for the facility's two peel dryers and three process boilers. Specifically, this revision removes No. 2 distillate fuel oil as an authorized fuel and revises the best management practices for carbon monoxide (CO). Citrosuco North America, Inc. is a citrus processing facility categorized under Standard Industrial Classification No. 2033. The facility is located in Polk County at 5937 Hwy 60 East, Lake Wales, Florida. The UTM coordinates are Zone 17, 451.7 km East and 3085.8 km North.

This final permit is organized into the following sections: Section 1 (General Information) and Section 2 (Permit Revisions). As noted in the Final Determination provided with this final permit, only minor changes and clarifications were made to the draft permit.

STATEMENT OF BASIS

This air pollution construction 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.). 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. A copy of this permit modification shall be filed with the referenced permit and shall become part of the 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 Hillsborough County, Florida

A blue ink signature of Pamala Vazquez, written in a cursive style, is positioned above a horizontal line.

Pamala Vazquez
Program Administrator
Permitting & Waste Cleanup Program
Southwest District

FINAL PERMIT

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Determination and Final Permit Revision) 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 the date indicated below to the following persons.

Nicholas Emanuel, Citrosuco North America, Inc., nmanuel@citrosuco.com

Carlos Alvarez, Citrosuco North America, Inc., calvarez@citrosuco.com


Wayne E. Griffin, G2 Services, Ltd., g2services@aol.com

Robert Hayden, Florida DEP Southwest District robert.hayden@dep.state.fl.us

Danielle Henry, Florida DEP Southwest District danielle.d.henry@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)

October 18, 2016

(Date)

SECTION 1. GENERAL INFORMATION (FINAL)

FACILITY DESCRIPTION

This facility processes up to 32,000,000 boxes of citrus into various citrus products and animal feed. This facility consists of two citrus peel dryers connected to three waste heat evaporators, two citrus peel pellet coolers, four boilers (three boilers are regulated emissions units and one is classified as an insignificant emissions unit), two emergency stationary diesel engines, and process equipment (which include fruit washers, oil and juice extraction equipment, cooling towers, fruit and peel conveyance equipment, lime silo, and peel storage).

FACILITY REGULATORY CLASSIFICATION

- The facility is not a major source of hazardous air pollutants (HAP).
- The facility does not operate 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.

PROPOSED PROJECT

This project revises the conditions authorized in Construction Permit No. 1050001-013-AC for the facility's two peel dryers and three boilers as follows:

- (1) No. 2 distillate fuel oil is removed as an authorized fuel, and
- (2) the Best Management Practices for Carbon Monoxide are revised and simplified to correspond to units burning natural gas only.

SECTION 2. PERMIT REVISIONS (FINAL)

The following permit conditions are revised as indicated. Strikethrough is used to denote the deletion of text. Double-underlines are used to denote the addition of text. All changes are emphasized with yellow highlight.

Permit Being Modified: Permit No. 1050001-013-AC

Affected Emissions Units: EU-006 and EU-007

Subsection 3A, Specific Condition A.2.: This condition is revised as follows.

- 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.~~

Subsection 3A, Specific Condition A.6.: This condition is revised as follows.

- 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.~~

Subsection 3A, Specific Condition A.10 and 13.: These conditions are deleted from the permit.

- ~~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.~~

- ~~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.~~

Subsection 3A, Specific Condition A.16.: This condition is revised as follows.

- 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 below. 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. Operate the citrus peel dryers in conformity to the manufacturer's manual or recommended practices to insure optimal control of carbon monoxide. From such manual practices, develop a checklist and document at least once every citrus season that the recommended operations are properly applied and practiced.
- b. Perform an inspection of combustion equipment as prescribed by the manufacturer or professional engineer, but no less than annually, and replace parts that are worn or improperly operating.
- 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;
- c.b. Maintain a written plan with operating procedures for startup, shutdown and malfunction of the equipment, and follow that plan during these events.
- d. Maintain documentation to demonstrate compliance with items a, b and c above.

SECTION 2. PERMIT REVISIONS (FINAL)

- ~~e. 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;~~

Affected Emissions Units: EU-001, EU-008 and EU-012

Subsection 3C, Specific Condition C.3.: This condition is revised as follows.

- 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.~~

Subsection 3C, Specific Condition C.6.: This condition is revised as follows.

- 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.~~

Subsection 3C, Specific Condition C.7., C.11. & C.14: These conditions are deleted from the permit.

~~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.~~

~~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.~~

~~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.~~

Subsection 3C, Specific Condition C.16.: This condition is revised as follows.

- 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 below. The facility shall report to the Department any failure to

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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. Operate the boilers in conformity to the manufacturer's manual or recommended practices to insure optimal control of carbon monoxide. From such manual and practices, develop a checklist and document at least once every citrus season that the recommended operations are properly applied and practiced.
- b. 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.
- ~~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;~~
- ~~c. b. Maintain a written plan with operating procedures for startup, shutdown and malfunction of the equipment, and follow that plan during these events.~~
- ~~d. Maintain documentation to demonstrate compliance with items a, b and c above.~~
- ~~e. 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.~~