

TO: Mara Nasca  
FROM: Ed Svec  
DATE: July 13, 2000  
SUBJ: Title V Pre-DRAFT Permit Review  
A. Duda & Sons, Inc./ Citrus Belle  
0510004-001-AV

Thank you for submitting your pre-DRAFT Title V permits. Also, thanks for using the standardized formats. My comments on the pre-DRAFT are listed below (call me if you have any questions to my comments):

No comments. Good job!

If there are any questions, please give me a call at (850) 921-8985. Again, thanks for following the formats and allowing us the ability to provide comments.

EJS/s

copy to: Scott Sheplak

PRE-DRAFT

Review By

7/20/00

CERTIFIED MAIL #  
RETURN RECEIPT REQUESTED

A. Duda & Sons, Inc./Citrus Belle  
6000 State Road 29  
LaBelle, Florida 33975

Re: DRAFT Title V Permit No.: 0510004-001-AV

Dear Mr. Harvey:

One copy of the DRAFT Title V Air Operation Permit for the operation of Boilers No.2 and No.5, Citrus Feed Mill (dryer/waste heat evaporator), Pellet Cooler, and a lime silo located at 6000 State Road 29, LaBelle, Florida, Hendry County, is enclosed. The permitting authority's "INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" and the "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" are also included.

The "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" must be published as soon as possible upon receipt of this letter. Proof of publication, i.e., newspaper affidavit, must be provided to the permitting authority's office within 7 (seven) days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit.

Please submit any written comments you wish to have considered concerning the permitting authority's proposed action to David M. Knowles, Air Program Administrator, at the above letterhead address. If you have any other questions, please contact Mara G. Nasca at 941/332-6975, Ext. 188.

Sincerely,

DRAFT

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Richard W. Cantrell  
Director of  
District Management

RWC/MGN/jw  
Enclosures  
In the Matter of an  
Application for Permit by:

A. Duda & Sons, Inc.  
6000 SR 29 South  
LaBelle, Florida 33975

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DRAFT Permit No.: 0510004-001-AV  
Citrus Belle  
Hendry County

INTENT TO ISSUE TITLE V AIR OPERATION PERMIT

The State of Florida Department of Environmental Protection (permitting authority) gives notice of its intent to issue a Title V air operation permit (copy of DRAFT Permit attached) for the Title V source detailed in the application specified above, for the reasons stated below.

The applicant, A. Duda & Sons, Inc. applied on June 14, 1996, to the permitting authority for a Title V air operation permit for the Citrus Belle facility located at 6000 State Road 29, LaBelle, Florida, Hendry County.

The permitting authority has permitting jurisdiction under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, and 62-213. This source is not exempt from Title V permitting procedures. The permitting authority has determined that a Title V air operation permit is required to commence or continue operations at the described facility.

The permitting authority intends to issue this Title V air operation permit based on the belief that reasonable assurances have been provided to indicate that operation of the source will not adversely impact air quality, and the source will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-256, 62-257, 62-281, 62-296, and 62-297, F.A.C.

Pursuant to Sections 403.815 and 403.087, F.S., and Rules 62-110.106 and 62-210.350(3), F.A.C., you (the applicant) are required to publish at your own expense the enclosed "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT." The 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. For the purpose of these rules, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. Where there is more than one newspaper of general circulation in the county, the newspaper used must be one with significant circulation in the area that may be affected by the permit. If you are uncertain that a newspaper meets these requirements, please contact the permitting authority at the address or telephone number listed below. The applicant shall provide proof of publication to the permitting authority's office, Florida Department of Environmental Protection, Post Office Box 2549, Fort Myers, Florida, 33902-2549 (Telephone: (941) 332-6975; Fax: (941) 332-6969, within 7 (seven) days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit pursuant to Rule 62-110.106, F.A.C.

The permitting authority will issue the Title V PROPOSED Permit, and subsequent Title V FINAL Permit, in accordance with the conditions of the attached Title V DRAFT Permit unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The permitting authority will accept written comments concerning the proposed permit issuance action for a period of 30 (thirty) days from the date of publication of the "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT." Written comments should be provided to the permitting authority office. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in this DRAFT Permit, the permitting authority shall issue a Revised DRAFT Permit and require, if applicable, another Public Notice.

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 (received) 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) 488-9314, Fax: (850) 487-4938). Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, 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 fourteen 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 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 how and when each petitioner received notice of the agency action or proposed action;

(d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate;

(e) A concise statement of the ultimate facts alleged, as well as the rules and statutes which entitle the petitioner to relief;

(f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and,

(g) A statement of the relief sought by the petitioner, stating precisely the action 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 notice of intent. 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 will not be available in this proceeding.

In addition to the above, a person subject to regulation has a right to apply to the Department of Environmental Protection for a variance from or waiver of the requirements of particular rules, on certain conditions, under Section 120.542, F.S. The relief provided by this state statute applies only to state rules, not statutes, and not to any federal regulatory requirements. Applying for a variance or waiver does not substitute or extend the time for filing a petition for an administrative hearing or exercising any other right that a person may have in relation to the action proposed in this notice of intent.

The application for a variance or waiver is made by filing a petition with the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-3000. The petition must specify the following information:

(a) The name, address, and telephone number of the petitioner;

(b) The name, address, and telephone number of the attorney or qualified representative of the petitioner, if any;

(c) Each rule or portion of a rule from which a variance or waiver is requested;

(d) The citation to the statute underlying (implemented by) the rule identified in (c) above;

(e) The type of action requested;

(f) The specific facts that would justify a variance or waiver for the petitioner; .

(g) The reason why the variance or waiver would serve the purposes of the underlying statute (implemented by the rule); and,

(h) A statement whether the variance or waiver is permanent or temporary and, if temporary, a statement of the dates showing the duration of the variance or waiver requested.

The Department will grant a variance or waiver when the petition demonstrates both that the application of the rule would create a substantial hardship or violate principles of fairness, as each of those terms is defined in Section 120.542(2), F.S., and that the purpose of the underlying statute will be or has been achieved by other means by the petitioner.

Persons subject to regulation pursuant to any federally delegated or approved air program should be aware that Florida is specifically not authorized to issue variances or waivers from any requirements of any such federally delegated or approved program. The requirements of the program remain fully enforceable by the Administrator of the United States Environmental Protection Agency and by any person under the Clean Air Act unless and until the Administrator separately approves any variance or waiver in accordance with the procedures of the federal program.

Finally, pursuant to 42 United States Code (U.S.C.) Section 7661d(b)(2), any person may petition the Administrator of the EPA within 60 (sixty) days of the expiration of the Administrator's 45 (forty-five) day review period as established at 42 U.S.C. Section 7661d(b)(1), to object to issuance of any permit. Any petition shall be based only on objections to the permit that were raised with reasonable specificity during the 30 (thirty) day public comment period provided in this notice, unless the petitioner demonstrates to the Administrator of the EPA that it was impracticable to raise such objections within the comment period or unless the grounds for such objection arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any permit properly issued pursuant to the provisions of Chapter 62-213, F.A.C. Petitions filed with the Administrator of EPA must meet the requirements of 42 U.S.C. Section 7661d(b)(2) and must be filed with the Administrator of the EPA at: U.S. EPA, 401 M Street, S.W., Washington, D.C. 20460.

Executed in Fort Myers, Florida.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL PROTECTION

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Richard W. Cantrell  
Director of  
District Management

RWC/MGN/jw

C E R T I F I C A T E O F S E R V I C E

The undersigned duly designated deputy agency clerk hereby certifies that this INTENT TO ISSUE TITLE V AIR OPERATION PERMIT (including the PUBLIC NOTICE and the DRAFT permit) and all copies were sent by certified mail before the close of business on \_\_\_\_\_ to the person(s) listed:

Charles H. Harvey, General Manager, A. Duda & Sons, Inc.

In addition, the undersigned duly designated deputy agency clerk hereby certifies that copies of this INTENT TO ISSUE TITLE V AIR OPERATION PERMIT (including the PUBLIC NOTICE and the DRAFT permit) were sent by U.S. mail on the same date to the person(s) listed or as otherwise noted:

John B. Koogler P.E., Koogler & Associates  
Joseph Kahn, FDEP (INTERNET E-mail)  
Elizabeth Bartlett, U.S. EPA, Region 4 (INTERNET E-mail Memorandum)  
Gregg Worley, U.S. EPA, Region 4 (INTERNET E-mail Memorandum)

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)

\_\_\_\_\_  
(Date)

**PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT**

**STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION**

Title V DRAFT Permit No.: 0510004-001-AV  
Citrus Belle  
Hendry County

The State of Florida Department of Environmental Protection (permitting authority) gives notice of its intent to issue a Title V air operation permit to A. Duda & Sons, Inc. for the Citrus Belle facility located at 6000 State Road 29, LaBelle, Florida, Hendry County. The applicant's name and address are: Charles H. Harvey, General Manager, A. Duda & Sons, Inc., 6000 State Road 29, LaBelle, Florida, Hendry County.

The permitting authority will issue the Title V PROPOSED Permit, and subsequent Title V FINAL Permit, in accordance with the conditions of the Title V DRAFT Permit unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The permitting authority will accept written comments concerning the proposed Title V DRAFT Permit issuance action for a period of 30 (thirty) days from the date of publication of this Notice. Written comments should be provided to the permitting authority's office Florida Department of Environmental Protection, Post Office Box 2549, Fort Myers, Florida, 33902-2549. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in this DRAFT Permit, the permitting authority shall issue a Revised DRAFT Permit and require, if applicable, another Public Notice.

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 of the Florida Statutes (F.S.). The petition must contain the information set forth below and must be filed (received) 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) 488-9314, Fax: (850) 487-4938). Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of the notice of intent, 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 fourteen 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 applicable 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 will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205 of the Florida Administrative Code (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; 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 petitioner's substantial rights will be affected by the agency determination;
- (c) A statement of how and when the petitioner received notice of the agency action or proposed action;
- (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, as well as the rules and statutes which entitle petitioner to relief;
- (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and,
- (g) A statement of the relief sought by the petitioner, stating precisely the action 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 notice of intent. 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 is not available for this proceeding.

In addition to the above, pursuant to 42 United States Code (U.S.C.) Section 7661d(b)(2), any person may petition the Administrator of the EPA within 60 (sixty) days of the expiration of the Administrator's 45 (forty-five) day review period as established at 42 U.S.C. Section 7661d(b)(1), to object to issuance of any permit. Any petition shall be based only on objections to the permit that were raised with reasonable specificity during the 30 (thirty) day public comment period provided in this notice, unless the petitioner demonstrates to the Administrator of the EPA that it was impracticable to raise such objections within the comment period or unless the grounds for such objection arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any permit properly issued pursuant to the provisions of Chapter 62-213, F.A.C. Petitions filed with the Administrator of EPA must meet the requirements of 42 U.S.C. Section 7661d(b)(2) and must be filed with the Administrator of the EPA at: U.S. EPA, 401 M Street, S.W., Washington, D.C. 20460.

A complete project file is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Permitting Authority:

Florida Department of Environmental Protection,  
2295 Victoria Avenue, Suite 364W  
Fort Myers, Florida 33902-2549  
Telephone: (941) 332-6975  
Fax: (941) 332-6969

The complete project file includes the DRAFT Permit, the application, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact Mara G. Nasca, at the above address, or call (941) 332-6975, Ext. 188, for additional information.

A. Duda & Sons, Inc.  
Citrus Belle  
Facility ID No.: 0510004  
Hendry County

Initial Title V Air Operation Permit  
DRAFT Permit No.: 0510004-001-AV

Permitting Authority:

State of Florida Department of Environmental Protection  
Post Office Box 2549  
Fort Myers, Florida 33902-2549  
Telephone: (941) 332-6975  
Fax: (941) 332-6969

[Drafted on Month day, year]

Initial Title V Air Operation Permit  
DRAFT Permit No.: 0510004-001-AV

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**Permittee:**  
A. Duda & Sons, Inc.  
6000 SR 29 South  
LaBelle, Florida 33975

**DRAFT Permit No.:** 0510004-001-AV  
**Facility ID No.:** 0510004  
**SIC Nos.:** 2037  
**Project:** Initial Title V Air Operation Permit

This Title V air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, and 62-213. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

This permit is for the operation of the Citrus Belle facility. This facility is located at 6000 SR 29 South, LaBelle, Hendry County; UTM Coordinates: Zone 17, 456.5 km East and 2950.3 km North; Latitude: 26°40 '30 " North and Longitude: 81° 26' 14" West.

The facility consists of two boilers, one peel dryer/waste heat evaporator, one pellet cooler, and one lime silo.

This facility is a Title V facility, since it has the potential to emit 100 tons per year or more of volatile organic compounds (VOC), carbon monoxide (CO), and sulfur dioxide (SO2). This facility has accepted fuel and process limitations to avoid being classified as a PSD major source.

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

Based on the initial Title V permit application received June 14, 1996, this facility is not a major source of hazardous air pollutants (HAPs), however, future testing may show the facility is a major source of hazardous air pollutants (HAPs).

**Referenced attachments made a part of this permit:**

- Appendix CP-1, Compliance Plan
- Appendix I-1, List of Insignificant Emissions Units and/or Activities
- Appendix SS-1, STACK SAMPLING FACILITIES version dated 10/07/96
- Appendix TV-3, TITLE V CONDITIONS version dated 04/30/99
- Appendix U-1, List of Unregulated Emissions Units and/or Activities
- Best Available Control Technology (BACT) dated March 1, 2000

**Effective Date:**  
**Renewal Application Due Date:**  
**Expiration Date:**  
STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL PROTECTION

W. Cantrell

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Director of  
District Management

Richard

Section I. Facility Information.

Subsection A. Facility Description.

A. Duda & Sons, Inc.: the Citrus Belle facility consists of juice extraction and processing, feedmill processing, and cold storage. The facility produces various citrus juice products and animal feed.

Based on the initial Title V permit application received June 14, 1996, this facility is not a major source of hazardous air pollutants (HAPs), however, future testing may show the facility is a major source of hazardous air pollutants (HAPs).

Subsection B. Summary of Emission Unit ID Nos. and Brief Descriptions.

<u>E U. ID No.</u>	<u>Brief Description</u>
003	Boiler No. 2
007	Boiler No. 5
008	Peel Dryer / Waste Heat Evaporator
009	Pellet Cooler
010	Lime Silo

Unregulated Emissions Units and/or Activities

1. Emergency generator: used only during periodic testing and periods of unplanned power outages. The unit is operated less than 400 hours a year.

***Please reference the Permit No., Facility ID No., and appropriate Emissions Unit(s) ID No(s). on all correspondence, test report submittals, applications, etc.***

Subsection C. Relevant Documents.

The documents listed below are not a part of this permit; however, they are specifically related to this permitting action.

These documents are provided to the permittee for information purposes only:

Table 1-1, Summary of Air Pollutant Standards and Terms

Table 2-1, Summary of Compliance Requirements

Appendix A-1, Abbreviations, Acronyms, Citations, and Identification Numbers

Appendix H-1, Permit History/ID Number Changes

These documents are on file with the permitting authority:

Initial Title V Permit Application received June 14, 1996.

Additional Information Request dated June 4, 1999

Additional Information Response received Sept. 16, 1999

Additional Information Request dated October 5, 1999

Additional Information Response received October 26, 1999

Additional Information Request dated November 23, 1999

Additional Information Response received December 3, 1999

Section II. Facility-wide Conditions.

The following conditions apply facility-wide:

1. APPENDIX TV-3, TITLE V CONDITIONS, is a part of this permit.

{Permitting note: APPENDIX TV-3, TITLE V CONDITIONS, is distributed to the permittee only. Other persons requesting copies of these conditions shall be provided a copy when requested or otherwise appropriate.}

2. Not federally enforceable. General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited. No person shall cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor.

[Rule 62-296.320(2), F.A.C.]

3. General Particulate Emission Limiting Standards. General Visible Emissions Standard.

Except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20 percent opacity). EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C.

[Rules 62-296.320(4)(b)1. & 4., F.A.C.]

4. Prevention of Accidental Releases (Section 112(r) of CAA).

a. The permittee shall submit its Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center when, and if, such requirement becomes applicable ; and

b. The permittee shall submit to the permitting authority Title V certification forms or a compliance schedule in accordance with Rule 62-213.440(2), F.A.C.

[40 CFR 68]

5. Unregulated Emissions Units and/or Activities. Appendix U-1, List of Unregulated Emissions Units and/or Activities, is a part of this permit.

[Rule 62-213.440(1), F.A.C.]

6. Insignificant Emissions Units and/or Activities. Appendix I-1, List of Insignificant Emissions Units and/or Activities, is a part of this permit.

[Rules 62-213.440(1), 62-213.430(6) and 62-4.040(1)(b), F.A.C.]

7. Compliance Plan. Based on the newly constructed boiler, peel dryer, and pellet cooler this facility must show compliance with the Specific Conditions of Construction Permit 0510004-002-AC, dated May 3, 2000. Appendix CP-1, Compliance Plan, is a part of this permit.

[Rule 62-213.440(2), F.A.C.]

8. Not federally enforceable. General Pollutant Emission Limiting Standards. Volatile Organic Compounds Emissions or Organic Solvents Emissions. The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department.

[Rule 62-296.320(1)(a), F.A.C.]

9. Not federally enforceable. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility include:

- a) Application of water to paved and unpaved areas accommodating vehicular traffic if a visible particulate plume is observed to extend more than 15 feet from the point of origin.
- b) Removal of particulate matter from buildings or work areas to prevent a visible particulate plume of unconfined particulate matter from being visible more than 15 feet from the point of origin.
- c) Enclosure or covering of conveyor systems where necessary to prevent unconfined particulate matter emissions from being visible more than 15 feet from the point of origin.

{Note: This condition implements the requirements of Rules 62-296.320(4)(c)1., 3., & 4. F.A.C. (condition 58. of APPENDIX TV-3, TITLE V CONDITIONS.)}

[Rule 62-296.320(4)(c)2., F.A.C.; and, proposed by applicant in the initial Title V permit application received June 14, 1996.]

10. When appropriate, any recording, monitoring, or reporting requirements that are time-specific shall be in accordance with the effective date of the permit, which defines day one.

[Rule 62-213.440, F.A.C.]

11. The permittee shall submit all compliance related notifications and reports required of this permit to the Department's South District office:

Department of Environmental Protection  
South District  
Post Office Box 2549  
Fort Myers, FL 33902-2549  
Telephone: 941/332-6975  
Fax: 941/332-6969

12. Any reports, data, notifications, certifications, and requests required to be sent to the United States Environmental Protection Agency, Region 4, should be sent to:

United States Environmental Protection Agency  
Region 4  
Air, Pesticides & Toxic Management Division  
Air and EPCRA Enforcement Branch, Air Enforcement Section  
61 Forsyth Street  
Atlanta, Georgia 30303  
Telephone: 404/562-9155, Fax: 404/562-9164

Section III. Emissions Units and Conditions.

Subsection A. This section addresses the following emissions units.

E.U.

<u>I.D. No.</u>	<u>Brief Description</u>
003	Boiler # 2 750 HP
007	Boiler # 5 1000 HP

Emissions Unit 003 is a Johnston Model 509, 750 HP fossil fuel steam generator, commercial operation commenced in 1978. This unit will serve as a back-up boiler. The maximum amount of fuel oil shall not exceed 210 gallons per hour.

Emission Unit 007 is a Johnston Model 538, 1000 HP, fossil fuel steam generator, commercial operation commenced in 1978. The maximum amount of fuel oil shall not exceed 280 gallons per hour.

These boilers were built prior to the NSPS applicability deadline of June 9, 1989.

The emissions from both boilers combined are effectively limited by the conditions of this permit to the following limits in tons per year: CO, 8.4; NO<sub>x</sub>, 37.6; PM<sub>10</sub>, 8.5; and VOC, 0.3.

A. Duda & Sons, Inc. has requested both emissions units be limited to 1,201,873 gallons of fuel oil in any consecutive 12-month period. This limit was requested to avoid Prevention of Significant Deterioration (PSD) review.

{Permitting Note: Emissions Unit 007, Boiler #5 is regulated under Rule 62-296.406, F.A.C., Fossil Fuel Steam Generators with Less than 250 million Btu per Hour Heat Input and Best Available Control Technology (BACT) dated March 1, 2000}

The following specific conditions apply to the emissions units listed above:

Essential Potential to Emit (PTE) Parameters

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

<u>Unit No.</u>	<u>MMBtu/hr Heat Input</u>	<u>Fuel Type</u>
Boiler # 2	31.05 MMBtu/hr	Fuel oil or natural gas
Boiler # 5	42 MMBtu/hr	Fuel oil or natural gas

[Rules 62-4.160(2), 62-210.200(PTE), 62-296.406, F.A.C., Construction Permit 0510004-002-AC, and BACT Determination dated March 1, 2000]

A.2. Emissions Unit Operating Rate Limitation after Testing. See Specific Condition E.3.  
[Rule 62-297.310(2), F.A.C.]



A.3. Method of Operation - Fuels. The only fuel to be burned in these emissions units is new (virgin) fuel oil or natural gas. The sulfur content of the fuel oil shall be less than or equal to 0.6 percent by weight. The fuel oil consumption of both boilers combined shall not exceed 1,201,873 gallons of fuel oil in any consecutive 12-month period. The natural gas consumption of both boilers combined shall not exceed 200 million cubic feet in any consecutive 12-month period. For all fuels, the total heat input to both boilers combined shall not exceed 205,000 million Btu (MMBtu) in any consecutive 12-month period.

[Rule 62-213.440, F.A.C., Construction Permit 0510004-002-AC, and BACT Determination dated March 1, 2000]

A.4. Hours of Operation. The hours of operation for these emissions units are not limited (8760 hr/yr.), however, operation is restricted by other processing, consumption, or production limits specified in this permit.

[Rule 62-210.200(PTE), F.A.C. and Construction Permit 0510004-002-AC]

Emissions Limitations and Standards.

{Permitting note: Table 1-1, Summary of Air Pollutant Standards and Terms, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

A.5. These emissions limitations and standards have been established to avoid Prevention of Significant Deterioration (PSD) review.

- a) Carbon Monoxide Emissions (CO). Carbon monoxide emissions shall not exceed 0.082 pounds per MMBtu of heat input.
- b) Nitrogen Oxide Emissions (NOx). Nitrogen oxide emissions shall not exceed 0.367 pounds per MMBtu of heat input.
- c) Particulate Matter Emissions (PM/PM10). Particulate matter emissions shall not exceed 0.083 pounds per MMBtu of heat input.
- d) Sulfur Dioxide (SO2). Sulfur dioxide emissions are limited by the fuel sulfur content of less than or equal to 0.6 percent by weight.
- e) Visible Emissions (VE). Visible emissions shall not be equal to or exceed 20 percent opacity except for one six-minute period per hour during which opacity shall not exceed 27 percent opacity.
- f) Volatile Organic Compound Emissions (VOC). Volatile organic compound emissions shall not exceed 0.003 pounds per MMBtu of heat input.

[Rule 62-296.406, F.A.C. and 62-213.440, Construction Permit 0510004-002-AC, and BACT dated March 1, 2000 ]

Test Methods and Procedures

{Permitting note: Table 2-1, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

A.6. These Test Methods and Procedures have been established to show compliance with the Emissions Limitations and Standards for the avoidance of Prevention of Significant Deterioration (PSD) review.

- a) Carbon Monoxide. The test method for carbon monoxide emissions shall be EPA Method 10, incorporated and adopted by reference in Chapter 62-297, F.A.C. Test shall be conducted annually within 60 days of the established frequency base date. The frequency base date has been defined as May 11th.  
[Construction Permit 0510004-002-AC]
- b) Nitrogen Oxide. The test method for nitrogen oxide emissions shall be EPA Method 7E, incorporated and adopted by reference in Chapter 62-297, F.A.C. Test shall be conducted annually within 60 days of the established frequency base date. The frequency base date has been defined as May 11th.  
[Construction Permit 0510004-002-AC]
- c) Particulate Matter Emissions. The test method for particulate matter emissions shall be EPA Method 5, incorporated and adopted by reference in Chapter 62-297, F.A.C.  
Test shall be conducted annually within 60 days of the established frequency base date. The frequency base date has been defined as May 11th.  
[Rules 62-296.320(4)(a), 62-297.401(5), 62-4.070(3), F.A.C., and Construction Permit 0510004-002-AC]
- d) Sulfur Dioxide. Sulfur dioxide emissions shall be determined based on a certification from the fuel supplier for each delivery. The fuel sulfur content, percent by weight, for liquid fuels shall be evaluated using either ASTM D2622, ASTM D4294-90, both ASTM D4057-88 and ASTM D129-91, or latest edition.  
[Rules 62-296.406(3), 62-213.440, 62-297.440, F.A.C., and Construction Permit 0510004-002-AC]
- e) Visible Emissions. The test method for visible emissions shall be EPA Method 9, incorporated in Chapter 62-297, F.A.C. Test shall be conducted annually within 60 days of the established frequency base date. The frequency base date has been defined as May 11th.  
[Rules 62-213-440, 62-297.401(9)(a), F.A.C., and Construction Permit 0510004-002-AC]
- f) Volatile Organic Compounds. The test method for volatile organic compound emissions shall be EPA Method 25A, incorporated and adopted by reference in Chapter 62-297, F.A.C. Test shall be conducted annually within 60 days of the established frequency base date. The frequency base date has been defined as May 11th.  
[Rule 62-297.401(25)(a) F.A.C. and Construction Permit 0510004-002-AC ]

Record keeping and Reporting Requirements

A. 7. The permittee subject to sulfur dioxide emission limits or fuel oil sulfur limit requirements shall keep records for a period of five years. These records shall be available for on-site inspection by the Department including the following information:

- a) The basis of these records shall be as-shipped analysis from the vendor.
- b) Records of fuel supplier certifications/analysis shall include a certified statement signed by the permittee that the records of fuel supplier certifications submitted represent all of the fuel combusted during the quarter.
- c) The permittee shall maintain records of the amounts of fuel combusted for each unit on a monthly, quarterly, and consecutive 12-month period basis.

- d) The permittee shall make and maintain records of the heat input for both boilers combined on a monthly, quarterly, and consecutive 12-month period basis, from records of fuel consumption and the heat content of the fuels burned.

[Rule 62-4.070(3), F.A.C. and Construction Permit 0510004-002-AC ]

A. 8. This emission unit is also subject to conditions E.1 through E.9. contained in Subsection E. Common Conditions.

Subsection B. This section addresses the following emissions unit.

E.U.            Brief Description  
ID.No.

008            Peel Dryer/Waste Heat Evaporator

Emissions Unit 008 is a Gulf Dryer, 40,000 pound per hour (lb/hr) capacity dryer equipped with a 60,000 lb/hr waste heat evaporator, commercial operation commenced in 1978. The maximum process rate is 35 tons per hour of wet peel (approximately 65% moisture). The maximum process rate for any consecutive 12-month period shall not exceed 7.5 million boxes of fruit.

The emissions from the dryer are effectively limited by the conditions of this permit to the following limits in tons per year: CO, 138.4; NO<sub>x</sub>, 23.5; PM<sub>10</sub>, 10.7; VOC, 457.4.

A. Duda & Sons, Inc. has requested this emissions unit be limited to 1,201,873 gallons of fuel oil in any consecutive 12-month period. This limit was requested to avoid Prevention of Significant Deterioration (PSD) review.

{Permitting Note: This emissions unit is subject to Rules 62-296.320(4)(a)2, 62.296.320(4)(b)1, F.A.C. and Best Available Control Technology (BACT) dated March 1, 2000}

The following specific conditions apply to the emissions unit listed above:

Essential Potential to Emit (PTE) Parameters

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

<u>Unit No.</u>	<u>MMBtu/hr Heat Input</u>	<u>Fuel Type</u>
Peel Dryer # 3	54 MMBtu/hr	Fuel oil or natural gas

The maximum process rate shall not exceed 12.3 tons per hour of bone dry peel or 35 tons per hour of wet peel (approximately 65% moisture). The maximum process rate for any consecutive 12-month period shall not exceed 7.5 million boxes of fruit.

[Rules 62-4.160(2), 62-210.200(PTE), and 62-296.406, F.A.C.]

B.2. Emissions Unit Operating Rate Limitation after Testing. See Specific Condition E.3.

[Rule 62-297.310(2), F.A.C.]

B.3. Method of Operation - Fuels. The only fuel to be burned in this unit is new (virgin) fuel oil or natural gas. The sulfur content of the fuel oil shall be less than or equal to 0.6 percent by weight. The fuel oil consumption of the dryer shall not exceed 1,201,873 gallons of fuel oil in any consecutive 12-month period. The natural gas consumption of the dryer shall not exceed 200 million cubic feet in any consecutive 12-month period. For all fuels, the total heat input to the dryer shall not exceed 205,000 million Btu (MMBtu) in any consecutive 12-month period.

[Rule 62-213.440, F.A.C., Construction Permit 0510004-002-AC, and BACT dated March 1, 2000]

B.4. Hours of Operation. The hours of operation for this emissions unit are not limited (8760 hr/yr.), however, operation is restricted by other processing, consumption, or production limits specified in this permit. [Rules 62-4.160(2) and 62-210.200(PTE), F.A.C. and Construction Permit 0510004-002-AC]

Emissions Limitations and Standards.

{Permitting note: Table 1-1, Summary of Air Pollutant Standards and Terms, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

B.5. These emissions limitations and standards have been established to avoid Prevention of Significant Deterioration (PSD) review.

- a) Carbon Monoxide Emissions (CO). Carbon monoxide emissions shall not exceed 36.9 pounds per thousand boxes.
- b) Nitrogen Oxide Emissions (NOx). Nitrogen oxide emissions shall not exceed 6.27 pounds per thousand boxes.
- c) Particulate Matter Emissions (PM/PM10). Particulate matter emissions shall not exceed 2.85 pounds per thousand boxes.
- d) Sulfur Dioxide (SO<sub>2</sub>). Sulfur dioxide emissions are limited by the fuel sulfur content of less than or equal to 0.6 percent by weight.
- e) Visible emissions (VE). Visible emissions shall not be equal to or exceed 20 percent opacity.
- f) Volatile Organic Compounds (VOC). Volatile organic compound emissions shall not exceed 122.0 pounds per thousand boxes.

[Rules 62-213.440, 62-296.320(4)(a), 62-296.320(4)(b), 62-296.320(4)(b)(1), F.A.C., Construction Permit 0510004-002-AC, and BACT dated March 1, 2000]

Test Methods and Procedures

{Permitting note: Table 2-1, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

B.6. These emissions limitations and standards have been established to avoid Prevention of Significant Deterioration (PSD) review.

- a) Carbon Monoxide. The test method for carbon monoxide emissions shall be EPA Method 10, incorporated and adopted by reference in Chapter 62-297, F.A.C. Test shall be conducted within 30 days of the start of the fruit processing season. Thereafter, tests shall be conducted annually alternating each year between early/mid fruit or grapefruit processing and during Valencia fruit processing. The initial compliance test was performed on May 9, 2000 using Valencia fruit, the next test shall be conducted within 30 days of the start of the fruit processing season.  
[Rules 62-297.401(10), 62-4.070(3), F.A.C., and Construction Permit 0510004-002-AC ]
- b) Particulate Matter Emissions. The test method for particulate matter emissions shall be EPA Method 5, incorporated and adopted by reference in Chapter 62-297, F.A.C. Test shall be conducted within 30 days of the start of the fruit processing season. Thereafter, tests shall be conducted annually alternating each year between early/mid fruit or grapefruit processing and during Valencia fruit

processing. The initial compliance test was performed on May 9, 2000 using Valencia fruit, the next test shall be conducted within 30 days of the start of the fruit processing season.

[Rules 62-296.320(4)(a), 62-297.401(5), 62-4.070(3), F.A.C., and Construction Permit 0510004-002-AC ]

- c) Nitrogen Oxide. The test method for nitrogen oxide emissions shall be EPA Method 7E, incorporated and adopted by reference in Chapter 62-297, F.A.C. Test shall be conducted within 30 days of the start of the fruit processing season. Thereafter, tests shall be conducted annually alternating each year between early/mid fruit or grapefruit processing and during Valencia fruit processing. The initial compliance test was performed on May 9, 2000 using Valencia fruit, the next test shall be within 30 days of the start of the fruit processing season.  
[Rules 62-297.401(5)(7)(c), 62-4.070(3), F.A.C., and Construction Permit 0510004-002-AC]
- d) Sulfur Dioxide. Sulfur dioxide emissions shall be determined based on a certification from the fuel supplier for each delivery. The fuel sulfur content, percent by weight, for liquid fuels shall be evaluated using either ASTM D2622, ASTM D4294-90, both ASTM D4057-88 and ASTM D129-91, or latest edition.  
[Rules 62-213.440, 62-297.440, F.A.C., and Construction Permit 0510004-002-AC ]
- e) Visible Emissions. The test method for visible emissions shall be EPA Method 9, incorporated in Chapter 62-297, F.A.C. Test shall be conducted within 30 days of the start of the fruit processing season. Thereafter, tests shall be conducted annually alternating each year between early/mid fruit or grapefruit processing and during Valencia fruit processing. The initial compliance test was performed on May 9, 2000 using Valencia fruit, the next test shall be within 30 days of the start of the fruit processing season.  
[Rules 62-213-440, 62-297.401(9), 62-4.070(3), F.A.C., and Construction Permit 0510004-002-AC ]
- f) Volatile Organic Compounds. The test method for volatile organic compound emissions shall be EPA Method 25A and Method 18 (optional) incorporated and adopted by reference in Chapter 62-297, F.A.C. Test shall be conducted within 60 days of issuance of this permit or within 30 days of the start of the fruit processing season. Thereafter, tests shall be conducted annually alternating each year between early/mid fruit or grapefruit processing and during Valencia fruit processing. The initial compliance test was performed on May 9, 2000 using Valencia fruit, the next test shall be within 30 days of the start of the fruit processing season.

Methane Emissions (optional). The test method for methane emissions shall be EPA Method 18, incorporated and adopted by reference in Chapter 62-297, F.A.C. The method may be used to determine methane emissions which may be subtracted from the Volatile Organic Compound (VOC) emission results to determine non-methane VOC emissions.

[Rules 62-297.401(25)(a), 62-297.401(18).F.A.C., ASP No. 97-G-01 dated April 2, 1998, and Construction Permit 0510004-002-AC ]

Monitoring of Operations.

B. 7. The permittee shall establish and maintain a Operational and Maintenance Plan for the peel dryer. The permittee shall submit the plan for approval by the Department within 60 days of permit issuance. The plan shall become a part of this permit, defined as Appendix A. Operational and Maintenance Plan.

[Rule 62-4.070(3), F.A.C. and Construction Permit 0510004-002-AC]

Pollution Control Equipment.

B. 8. The permittee shall install, operate, calibrate, and maintain the waste heat evaporator.

[Rule 62-4.070(3), F.A.C. and Construction Permit 0510004-002-AC]

B. 9. Air Quality Control System: To ensure compliance with Specific Conditions B. 5. (b) and B. 5. (e) of this permit the permittee shall submit periodic monitoring procedures for the waste heat evaporator to the Department for approval within 60 days of permit issuance.

a) Design Criteria: Periodic monitoring results shall be compared to the design criteria of the waste heat evaporator.

1) The permittee shall submit the design criteria for the waste heat evaporator within 60 days of permit issuance to the Department.

2) The permittee shall establish and submit parameter ranges for the waste heat evaporator within 60 days of permit issuance to the Department.

3) The parameter ranges will become a part of this permit.

b) Parameter data shall be continuously recorded for the dryer exhaust gas temperature on a strip chart recorder.

[Rule 62-213.440(1)(b), F.A.C. and Construction Permit 0510004-002-AC]

Record keeping and Reporting Requirements

B. 10. The permittee subject to sulfur dioxide emission limits or fuel oil sulfur limit requirements shall keep records available for on-site inspection by the Department including the following information:

a) The basis of these records shall be as-shipped analysis from the vendor.

b) Records of fuel supplier certifications/analysis shall include a certified statement signed by the permittee that the records of fuel supplier certifications submitted represent all of the fuel combusted during the quarter.

c) The permittee shall maintain records of the amounts of fuel combusted for each unit on a monthly, quarterly, and consecutive 12-month period basis.

- d) The permittee shall make and maintain records of the heat input for the dryer combined on a monthly, quarterly, and consecutive 12-month period basis, from records of fuel consumption and the heat content of the fuels burned.

[Rule 62-4.070(3), F.A.C. and Construction Permit 0510004-002-AC ]

B.11. In order to document assumptions made during the permitting process which allowed the permittee to avoid Prevention of Significant Deterioration (PSD) review, the permittee shall maintain the following records. These records shall be maintained on a permanent legible form suitable for inspection and kept for a period of five years.

- a) Daily records of the number of boxes per variety processed and the hours of drying.
- b) Monthly total and 12 month rolling total of boxes per variety.
- c) The daily average tons of press cake processed per hour. Press cake records shall include the tons per hour of press cake and the percent moisture content measured at least once during each day and additionally if a change in variety occurs.
- d) Monthly total and 12-month rolling total of tons of bone dry press cake sent to the dryer, calculated from records on amounts of press cake processed and drying hours.
- e) Amount of oil in the press cake going to the dryer measured once a week and additionally if a change in variety occurs.
- f) Bone dry peel generated in tons per day calculated from records of the press cake.
- g) Weekly records of the oil content, moisture content, and tons of feed pellets produced. Combined with the fruit processing records, these records shall be used to confirm the bone dry peel production (12-month rolling weighted average) estimated from the press cake records.

[Rule 62-4.070(3), F.A.C. and Construction Permit 0510004-002-AC ]

B.12. This emission unit is also subject to conditions E.1 through E.9. contained in Subsection E. Common Conditions.



Subsection C. This section addresses the following emissions unit.

<u>E.U.</u>	<u>Brief Description</u>
<u>I.D. No.</u>	
009	Pellet Cooler

Emissions Unit 009 is a Counter Flow Cooler, Model CC1924 pellet cooler.

The emissions from the cooler are effectively limited by the conditions of this permit to the following limits in tons per year: PM<sub>10</sub>, 2.1; VOC, 21.4.

A. Duda & Sons, Inc. has requested this emissions unit be limited. This limit was requested to avoid Prevention of Significant Deterioration (PSD) review. This emissions unit is equipped with a cyclone.

{Permitting Note: This emissions unit is subject to Rules 62-296.320(4)(a)2, and 62.296.320(4)(b)1, F.A.C.}

The following specific conditions apply to the emissions unit listed above:

Essential Potential to Emit (PTE) Parameters

c. 1. Permitted Capacity. The operating capacity shall not exceed 24,600 pounds/hour of bone dry peel. The maximum process rate for any consecutive 12-month period shall not exceed 7.5 million boxes of fruit.

<u>Unit No.</u>	<u>Maximum Dry Pellet Input Rate</u>	<u>Consecutive 12-month period</u>
No. 2	24,600 pounds/hour	7.5 million boxes

The maximum bone dry peel input rate has been limited to avoid Prevention of Significant Deterioration (PSD) review.

[Rules 62-4.160(2), 62-210.200(PTE), F.A.C. and Construction Permit 0510004-002-AC ]

c. 2. Hours of Operation. The hours of operation for this emissions unit are not limited (8760 hr/yr.), however operation is restricted by other processing, consumption, or production limits specified in this permit.

[Rule 62-210.200(PTE), F.A.C. and Construction Permit 0510004-002-AC ]

Emissions Limitations and Standards.

{Permitting note: Table 1-1, Summary of Air Pollutant Standards and Terms, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

c. 3. These emissions limitations and standards have been established to avoid Prevention of Significant Deterioration (PSD) review.

- a) Particulate Matter Emissions (PM/PM10). Emissions from the pellet cooler shall not exceed 0.56 pounds per thousand boxes.  
[Rule 62-213.440, F.A.C., and Construction Permit 0510004-002-AC ]
- b) Visible Emissions. Visible emissions shall not be equal to or exceed 5 percent opacity.  
[Rule 62-297.620, F.A.C. and Construction Permit 0510004-002-AC ]

- c) Volatile Organic Compound Emissions. Emissions from the pellet cooler shall not exceed 5.7 pounds per thousand boxes.  
[Rule 62-213.440, F.A.C., and Construction Permit 0510004-002-AC ]

Test Methods and Procedures

{Permitting note: Table 2-1, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

c.4. These emissions limitations and standards have been established to avoid Prevention of Significant Deterioration (PSD) review.

- a) Particulate Matter Emissions. The test method for particulate matter emissions shall be EPA Method 5, incorporated and adopted by reference in chapter 62-297, F.A.C. . Test shall be conducted within 30 days of the start of the fruit processing season. Thereafter, tests shall be conducted annually alternating each year between early/mid fruit or grapefruit processing and during Valencia fruit processing. The initial compliance test was performed on May 12, 2000 using Valencia fruit, the next test shall be within 30 days of the start of the fruit processing season.  
A visible emissions test indicating no visible emissions (5 percent opacity) may be submitted in lieu of a particulate stack test .  
[Rules 62-213.440, 62-297.401(5), 62-4.070(3), 62-297.620, 62-296.320(4)(a) F.A.C., and Construction Permit 0510004-002-AC]
- b) Visible emissions. The test method for visible emissions shall be EPA Method 9, incorporated in Chapter 62-297, F.A.C. Test shall be conducted within 30 days of the start of the fruit processing season. Thereafter, tests shall be conducted annually alternating each year between early/mid fruit or grapefruit processing and during Valencia fruit processing. The initial compliance test was performed on May 12, 2000 using Valencia fruit, the next test shall be within 30 days of the start of the fruit processing season.  
[Rules 62-213.440, 62-297.401(9), 62-4.070(3), F.A.C., and Construction Permit 0510004-002-AC ]
- c) Volatile Organic Compounds. The test method for volatile organic compound emissions shall be EPA Method 25A and Method 18 (optional) incorporated and adopted by reference in chapter 62-297, F.A.C. Test shall be conducted within 30 days of the start of the fruit processing season. Thereafter, tests shall be conducted annually alternating each year between early/mid fruit or grapefruit processing and during Valencia fruit processing. The initial compliance test was performed on May 12, 2000 using Valencia fruit, the next test shall be within 30 days of the start of the fruit processing season.  
[Rules 62-213.440, 62-297.401(25)(a), 62-297.401(18), 62-4.070(3), F.A.C., and Construction Permit 0510004-002-AC]

Monitoring of Operations

c.5. The facility shall keep records of normal routine maintenance. These records shall be kept for a period of five years and be made available to the Department for on-site inspection.

[Rule 62-4.070(3), F.A.C. and Construction Permit 0510004-002-AC]

c.6. This emission unit is also subject to conditions E.1 through E.9. contained in Subsection E. Common Conditions.

Subsection D. This section addresses the following emissions unit.

E.U. Brief Description

ID No.

010 Lime Storage Silo

The lime silo is part of the wet peel process. The lime silo shall be equipped with a water barrel which will be used to control particulate matter (lime dust) when loading lime pneumatically into the silo from trucks.

The following specific conditions apply to the emissions unit listed above:

Essential Potential to Emit (PTE) Parameters

D.1. Permitted Capacity. The maximum operating capacity is as follows:

<u>Unit No.</u>	<u>Maximum Throughput Rate</u>	<u>Maximum Hourly Rate</u>
#1	tons of lime/year	tons of lime

The permittee shall supply the Department with the above pertinent information (Maximum Throughput Rate and Maximum Hourly Rate) within 60 days of permit issuance.

D.2. Hours of Operation. The emission control device shall operate when the silo is being loaded with lime. The hours of operation for the silo are not restricted.

[Rule 62-4.160(2) and 62-210.200(PTE), F.A.C.]

Emission Limitations and Standards

{Permitting note: Table 1-1, Summary of Air Pollutant Standards and Terms, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

D.3. Visible Emissions. Visible emissions shall not be equal to or exceed 20 percent opacity.

[Rule 62-296.320(4)(b)1, F.A.C. and Construction Permit 0510004-002-AC ]

Pollution Control Equipment.

D. 4. In order to comply with Specific Condition D. 3. the permittee shall:

- a) Post a permanent sign attached to the fill pipe of the lime silo concerning proper water level in the emissions control device before loading silo.
- b) Perform visible inspections of the emissions control device prior to and during the loading operation.
- c) Mark the emissions control device with a minimum water level.
- d) Verify the water level in the emissions control device is above the minimum level before silo loading, fill and maintain minimum water level.
- e) Maintain a permanent water hose at the emissions control device location.

[Rule 62-4.070(3), F.A.C. and Construction Permit 0510004-002-AC]

Test Methods and Procedures

{Permitting note: Table 2-1, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

D. 5. All visible emissions tests performed pursuant to the requirements of this permit shall comply with the following provisions:

- a) The test method for visible emissions shall be EPA Method 9 incorporated in Chapter 62-297, F.A.C. Test shall be conducted annually within 60 days of the established frequency base date. The frequency base date has not been defined. The permittee shall perform the initial test within 30 days of the start of the fruit processing season.
- b) The required minimum period of observation for an EPA Method 9 compliance test shall be thirty (30) minutes or upon completion of the loading operation. The opacity test observation period shall include the period during which the highest opacity emissions can be expected to occur. If the operation is normally completed within less than 30 minutes and does not recur within that time, the test shall last for the length of the silo loading operation.

[Rules 62-297.310(4)(a)2., 62-296.320(4)a., and 62.297.401(9)(a), 62-4.070(3), F.A.C. and Construction Permit 0510004-002-AC]

Record keeping and Reporting Requirements

D. 6. The permittee shall perform visible inspections of the emission control device prior to and during operation. Each inspection shall be summarized and recorded. Any maintenance on the water barrel, lime silo, hopper and other storage or conveying equipment shall be recorded. These records shall be kept for five years. These records shall be available for on-site inspection by the Department.

[Rule 62-213.440, F.A.C. and Construction Permit 0510004-002-AC]

D. 7. This emission unit is also subject to conditions E.1 through E.9. contained in Subsection E. Common Conditions.

Subsection E. This section addresses the following emissions units.

003 Boiler No. 2 750 HP

007	Boiler No.5 1000 HP
008	Peel Dryer/Waste Heat Evaporator
009	Pellet Cooler
010	Lime Storage Silo

E.1. DEP Method 9. The provisions of EPA Method 9 (40 CFR 60, Appendix A) are adopted by reference with the following exceptions:

- a) EPA Method 9, Section 2.4, Recording Observations. Opacity observations shall be made and recorded by a certified observer at sequential fifteen second intervals during the required period of observation.
- b) EPA Method 9, Section 2.5, Data Reduction. For a set of observations to be acceptable, the observer shall have made and recorded, or verified the recording of, at least 90 percent of the possible individual observations during the required observation period. For single-valued opacity standards (e.g., 20 percent opacity), the test result shall be the highest valid six-minute average for the set of observations taken. For multiple-valued opacity standards (e.g., 20 percent opacity, except that an opacity of 40 percent is permissible for not more than two minutes per hour) opacity shall be computed as follows:
  - (1) For the basic part of the standard (i.e., 20 percent opacity) the opacity shall be determined as specified above for a single-valued opacity standard.
  - (2) For the short-term average part of the standard, opacity shall be the highest valid short-term average (i.e., two-minute, three-minute average) for the set of observations taken.

In order to be valid, any required average (i.e., a six-minute or two-minute average) shall be based on all of the valid observations in the sequential subset of observations selected, and the selected subset shall contain at least 90 percent of the observations possible for the required averaging time. Each required average shall be calculated by summing the opacity value of each of the valid observations in the appropriate subset, dividing this sum by the number of valid observations in the subset, and rounding the result to the nearest whole number. The number of missing observations in the subset shall be indicated in parenthesis after the subset average value.

[Rule 62-297.401(9)(a), F.A.C. and Construction Permit 0510004-002-AC]

E. 2. Applicable Test Procedures.

(a) Required Sampling Time.

1. Opacity Compliance Tests. When Method 9 is specified as the applicable opacity test method, the required minimum period of observation for a compliance test shall be sixty (60) minutes for emissions units which emit or have the potential to emit 100 tons per year or more of particulate matter, and thirty (30) minutes for emissions units which have potential emissions less than 100 tons per year of particulate matter and are not subject to a multiple-valued opacity standard. The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur.

[Rule 62-297.310(4)(a)2., F.A.C. and Construction Permit 0510004-002-AC]

E. 3. Operating Rate During Testing. Testing of emissions shall be conducted with the emissions unit operation at >90% capacity, when practical. If it is impractical to test at permitted capacity, an emissions unit may be tested at less than the maximum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test rate until a new test is conducted. Once the 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) , 62-4.070(3), F.A.C. and Construction Permit 0510004-002-AC]

E. 4. 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. and Construction Permit 0510004-002-AC]

Monitoring of Operations

E. 5. The permittee shall install, calibrate, maintain, and operate, in accordance with the manufacturer's instructions, equipment/instruments necessary to determine the compliance of the emissions unit with applicable emission limiting standards.

- a) Required Equipment. Equipment/instruments, including but not limited to, verifying heat input, exhaust temperature, water flow rate, pressure drop, scrubber water pressure, fuel usage, and hours of operation.
- b) Accuracy of Equipment. Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.

- c) Recording of Data. The permittee shall maintain a complete file of all measurements, including performance test measurements, calibration checks, adjustment and maintenance performed on the equipment/instruments; and all other information required, recorded on a permanent legible form suitable for inspection. The file shall be retained for at least five years following the date of such measurements, maintenance, reports, and records.

[Rule 62-297.310(5), F.A.C. and Construction Permit 0510004-002-AC ]

E. 6. The permittee shall notify the Department, 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.

[Rule 62-297.310(7), F.A.C. and Construction Permit 0510004-002-AC]

E. 7. Test Reports.

- a) The permittee of an emissions unit for which a compliance test is required shall file a report with the Department on the results of each such test.
- b) The required test report shall be filed with the Department as soon as practical but no later than 45 days after the last sampling run of each test is completed.
- c) The test report shall provide sufficient detail on the emissions unit tested and the test procedures used to allow the Department to determine if the test was properly conducted and the test results properly computed.

[Rule 62-297.310(8), F.A.C. and Construction Permit 0510004-002-AC]

E. 8. In the case of excess emissions resulting from malfunctions, the permittee shall notify the Department 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.

[Rule 62-210.700(6), F.A.C. and Construction Permit 0510004-002-AC]



## Appendix H-1, Permit History/ID Number Changes

A. Duda & Sons, Inc.  
Citrus Belle

**DRAFT Permit No.:** 0510004-001-AV  
**Facility ID No.:** 0510004

**Permit History (for tracking purposes):**

<u>E.U. ID No.</u>	<u>Description</u>	<u>Permit No.</u>	<u>Issue Date</u>	<u>Expiration Date</u>
001	Boiler #1: 600 HP Package Boiler	AC26-2087	11-14-1973	02-14-1974
		AO26-2087	02-25-1975	07-01-1975
		AO26-2087A	08-26-1975	08-26-1978
		AO26-5267	07-07-1978	07-07-1983
		AO26-77052	12-23-1983	12-23-1988
		AO26-157600	12-02-1988	12-02-1993
		AO26-240076	11-09-1993	11-09-1998
002	Peel Dryer/Waste Heat Evaporator: 30,000 lb/hr dryer, 20,000 lb/hr waste heat evaporator, and pellet cooler	AC26-2088	11-14-1973	02-14-1974
		AC26-2088A	10-01-1975	03-28-1976
		AO26-2088A	03-30-1976	03-30-1981
		AO26-51526	03-05-1982	03-05-1987
		AO26-131137	03-19-1987	03-19-1992
		AO26-208692	04-08-1992	04-08-1997
003	Boiler #2: 750 HP	AC26-4750	02-27-1978	08-27-1978
		AO26-5095	06-20-1978	06-20-1983
		AO26-77167	12-23-1983	12-23-1988
		AO26-157606	12-02-1988	12-02-1993
		AO26-240077	11-09-1993	11-09-1998

## Appendix H-1, Permit History/ID Number Changes

A. Duda & Sons, Inc.  
Citrus Belle

**DRAFT Permit No.:** 0510004-001-AV  
**Facility ID No.:** 0510004

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**Permit History (for tracking purposes):**

<u>E.U. ID No.</u>	<u>Description</u>	<u>Permit No.</u>	<u>Issue Date</u>	<u>Expiration Date</u>
004	Boiler #3 : Not Constructed	AC26-5410	11-09-1978	02-15-1979
005	Peel Dryer/Waste Heat Evaporator: 30,000 lb/hr dryer & 60,000 lb/hr waste heat evaporator: Not Constructed	AC26- 5409	11-16-1978	02-15-1980
006	Boiler #4 : 50 HP Package Boiler	AC26-2752 AO26-7007	06-25-1980 08-18-1980	01-25-1981 08-18-1985
007	Boiler #5 : 1000 HP	0510004-002-AC	05-03-2000	05-03-2005
008	Peel Dryer/Waste Heat Evaporator 40,000 lb/hr dryer & 60,000 lb/hr waste heat evaporator	0510004-002-AC	05-03-2000	05-03-2005
009	Pellet Cooler	0510004-002-AC	05-03-2000	05-03-2005
010	Lime Storage Silo	0510004-002-AC	05-03-2000	05-03-2005

Appendix I-1, List of Insignificant Emissions Units and/or Activities

A. Duda & Sons, Inc.  
No.: 0510004-001-AV  
Citrus Belle  
0510004

DRAFT Permit  
Facility ID No.:

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The facilities, emissions units, or pollutant-emitting activities listed in Rule 62-210.300(3)(a), F.A.C., Categorical Exemptions, are exempt from the permitting requirements of Chapters 62-210 and 62-4, F.A.C.; provided, however, that exempt emissions units shall be subject to any applicable emission limiting standards and the emissions from exempt emissions units or activities shall be considered in determining the potential emissions of the facility containing such emissions units. Emissions units and pollutant-emitting activities exempt from permitting under Rule 62-210.300(3)(a), F.A.C., shall not be exempt from the permitting requirements of Chapter 62-213, F.A.C., if they are contained within a Title V source; however, such emissions units and activities shall be considered insignificant for Title V purposes provided they also meet the criteria of Rule 62-213.430(6)(b), F.A.C. No emissions unit shall be entitled to an exemption from permitting under Rule 62.210.300(3)(a), F.A.C., if its emissions, in combination with the emissions of other units and activities at the facility, would cause the facility to emit or have the potential to emit any pollutant in such amount as to make the facility a Title V source.

The below listed emissions units and/or activities are considered insignificant pursuant to Rule 62-213.430(6), F.A.C.

Brief Description of Emissions Units and/or Activities

Pellet storage & handling  
Fruit storage and handling  
Juice extraction  
Juice processing  
Fuel oil storage tank  
Facility maintenance activities  
Waste water treatment system

Appendix U-1, List of Unregulated Emissions Units and/or Activities

A. Duda & Sons, Inc.  
No.: 0510004-001-AV  
Citrus Belle  
0510004

DRAFT Permit  
Facility ID No.:

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Unregulated Emissions Units and/or Activities. An emissions unit which emits no “emissions-limited pollutant” and which is subject to no unit-specific work practice standard, though it may be subject to regulations applied on a facility-wide basis (e.g., unconfined emissions, odor, general opacity) or to regulations that require only that it be able to prove exemption from unit-specific emissions or work practice standards.

The below listed emissions units and/or activities are neither ‘regulated emissions units’ nor ‘insignificant emissions units’.

Brief Description of Emissions Units and/or Activity

Emergency generator

APPENDIX CP-1, Compliance Plan

A. Duda & Sons, Inc.  
Citrus Belle

DRAFT Permit No.: 0510004-001-AV  
Facility ID No.: 0510004

In accordance with Rule 62-213.440(2), Florida Administrative Code (F.A.C.), this compliance plan is being included as a part of the initial Title V permit for A. Duda & Sons, Inc./ Citrus Belle located at 6000 State Road 29, LaBelle, Hendry County, to bring the facility into compliance with a number of items.

According to Rule 62-213.440(2), F.A.C., "the source shall meet measurable and enforceable milestones on no less than a semiannual basis until compliance is achieved and demonstrated to the Department. Each source shall notify the Department in writing, within 15 days after the date specified for completion of each milestone, to include the achievement of compliance, of progress achieved, requirements met, requirements not met, corrective measures adopted and an explanation of any measures not met by the completion date for the milestone or for compliance. All reports shall be accompanied by a certification, signed by a responsible official, in accordance with Rule 62-213.420(4), F.A.C."

1. The permittee shall submit revisions of the 1997, 1998, and 1999 Annual Operating Reports (AOR) to the South District within 30 days of issuance of this Draft Title V permit.
2. In accordance with Specific Condition B.6. of Construction Permit 0510004-002-AC, dated May 3, 2000: "the permittee shall establish and maintain an Operational and Maintenance Plan for the peel dryer. The permittee shall submit the plan for approval by the Department within 60 days of permit issuance. The plan shall become a part of this permit, defined as Appendix A. Operational and Maintenance Plan."

The permittee has not submitted an Operational and Maintenance Plan to the Department and is requested to do so within 30 days of issuance of this Draft Title V permit.

3. In accordance with Specific Condition B.8. of Construction Permit 0510004-002-AC, dated May 3, 2000: "Air Quality Control System: To ensure compliance with Specific Conditions B.5.(b) and B.5.(e) of this permit the permittee shall submit periodic monitoring procedures for the waste heat evaporator to the Department for approval within 60 days of permit issuance.
  - a) Design Criteria: Periodic monitoring results shall be compared to the design criteria of the waste heat evaporator.
    - 1) The permittee shall submit the design criteria for the waste heat evaporator within 60 days of permit issuance to the Department.

APPENDIX CP-1, Compliance Plan

A. Duda & Sons, Inc.  
Citrus Belle

DRAFT Permit No.: 0510004-001-AV  
Facility ID No.: 0510004

- 2) The permittee shall establish and submit parameter ranges for the waste heat evaporator within 60 days of permit issuance to the Department.
- 3) The parameter ranges will become a part of this permit.
- b) Parameter data shall be continuously recorded for the dryer exhaust gas temperature on a strip chart recorder.

The permittee has not submitted periodic monitoring procedures to the Department and is requested to do so within 30 days of issuance of this Draft Title V permit.

4. In accordance with Specific Condition D.5. of Construction Permit 0510004-002-AC, dated May 3, 2000 "All visible emissions tests performed pursuant to the requirements of this permit shall comply with the following provisions:
  - a) The test method for visible emissions shall be EPA Method 9 and shall be conducted annually on or during the 60 day period prior to the established frequency base date.
  - b) The required minimum period of observation for an EPA Method 9 compliance test shall be thirty (30) minutes or upon completion of the loading operation. The opacity test observation period shall include the period during which the highest opacity emissions can be expected to occur. If the operation is normally completed within less than 30 minutes and does not recur within that time, the test shall last for the length of the silo loading operation."

The permittee shall test the lime silo within 30 days of the start of fruit processing to establish the frequency base date.

5. In accordance with Specific Condition E.8. of Construction Permit 0510004-002-AC, dated May 3, 2000: " the permittee shall submit certification by a professional engineer registered in the State of Florida that the construction was completed noting any deviations from the conditions in the construction permit and/or test results where appropriate."

The permittee has not submitted a certification of completion to the Department and is requested to do so within 30 days of issuance of this Draft Title V permit.

**Table 1-1, Summary of Air Pollutant Standards and Terms**

**A. Duda & Sons, Inc.  
Citrus Belle**

**DRAFT Permit No.: 0510004-001-AV  
Facility ID No.: 0510004**

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

**E.U. ID No.      Brief Description**

003              Boiler No. 2, 750 HP  
007              Boiler No.5, 1000 HP

Pollutant	Fuel(s)	Hours/Year	Allowable Emissions			Equivalent Emissions*		Regulatory Citation(s)	See permit condition(s)
			Standard	lbs/MMBtu	TPY	lbs/hour	TPY		
CO	0.6 % fuel oil natural gas	8760		0.082	8.4			62-4.160(2), 62-210.200 and 62-213.440, F.A.C.	A.1., A.3., A.4., A.5.(a)
NOx	0.6 % fuel oil natural gas	8760		0.367	37.6			62-4.160(2), 62-210.200 and 62-213.440, F.A.C.	A.1., A.3., A.4., A.5.(b)
PM10	0.6 % fuel oil natural gas	8760		0.083	8.5			62-296.406(2),F.A.C. BACT, dated March 1,2000	A.1., A.3., A.4., A.5.(c)
SO2	0.6 % fuel oil natural gas	8760	0.6% sulfur by weight					62-296.406(3),F.A.C.	A.1., A.3., A.4., A.5.(d)
VE	0.6 % fuel oil natural gas	8760	< 20% opacity					62-296.406(1),F.A.C. and BACT dated March 1,2000	A.1., A.3., A.4., A.5.(e)
VOC	0.6 % fuel oil natural gas	8760		0.003	0.3			62-4.160(2), 62-210.200 and 62-213.440, F.A.C.	A.1., A.3., A.4., A.5.(f)

**Notes:**

- \* The "Equivalent Emissions" listed are for informational purposes only.
- \*\* Emission limits have been established to avoid Prevention of Significant Deterioration (PSD) review.

**Table 1-1, Summary of Air Pollutant Standards and Terms**

A. Duda & Sons, Inc.  
Citrus Belle

DRAFT Permit No.: 0510004-001-AV  
Facility ID No.: 0510004

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

**E.U. ID No.**    **Brief Description**  
008                      Peel Dryer/Waste Heat Evaporator

Pollutant	Fuel(s)	Hours/Year	Allowable Emissions			*Equivalent Emissions*		Regulatory Citation(s)	See permit condition(s)
			Standard	lbs./ thousand boxes	TPY	lbs./hour	TPY		
CO	0.6 % fuel oil natural gas	8760		36.9	138.4			62-4.160(2), 62-210.200 and 62-213.440,F.A.C.	B.1., B.2., B.3., B.5.(a)
NOx	0.6 % fuel oil natural gas	8760		6.27	23.5			62-4.160(2), 62-210.200 and 62-213.440, F.A.C.	B.1., B.2., B.3., B.5.(b)
PM10	0.6 % fuel oil natural gas	8760		2.85	10.7			62-296.320(4)(a),F.A.C.	B.1., B.2., B.3., B.5.(c)
SO2	0.6 % fuel oil natural gas	8760	0.6% sulfur by weight					BACT dated March 1, 2000	B.1., B.2., B.3., B.5.(d)
VE	0.6 % fuel oil natural gas	8760	< 20% opacity					62-296.320 (4)(b) and 62-296.320 (4)(b)(1),F.A.C.	B.1., B.2., B.3., B.5.(e)
VOC	0.6 % fuel oil natural gas	8760		122.0	457.4			62-4.160(2), 62-210.200 and 62-213.440, F.A.C.	B.1., B.2., B.3., B.5.(f)

**Notes:**

\* The "Equivalent Emissions" listed are for informational purposes only.

\*\* Emission limits have been established to avoid Prevention of Significant Deterioration (PSD) review.



**Table 1-1, Summary of Air Pollutant Standards and Terms**

**A. Duda & Sons,  
Inc.  
Citrus Belle**

**DRAFT Permit No.: 0510004-001-AV**

**Facility ID No.: 0510004**

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

**E.U. ID No.**            **Brief Description**  
009                      Pellet Cooler

Pollutant	Fuel(s)	Hours/Year	Allowable Emissions			Equivalent Emissions*		Regulatory Citation(s)	See permit condition(s)
			Standard	lbs./thousand boxes	TPY	lbs./hour	TPY		
PM10		8760		0.56	2.1			62-213.440,F.A.C.	C.1., C.2., C.3.(a)
VE		8760	< 5% opacity in lieu of Method 5					62-296.320 (4)(b)(1),F.A.C.	C.1., C.2., C.3.(b)
VOC		8760		5.7	21.4			62-213.440,F.A.C.	C.1., C.2., C.3.(c)

**Notes:**

\* The "Equivalent Emissions" listed are for informational purposes only.

\*\* Emission limits have been established to avoid Prevention of Significant Deterioration (PSD) review.

**Table 1-1, Summary of Air Pollutant Standards and Terms**

**A. Duda & Sons, Inc.**  
**Citrus Belle**

**DRAFT Permit No.: 0510004-001-AV**  
**Facility ID No.: 0510004**

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

**E.U. ID No.**      **Brief Description**  
 010                  Lime Silo

Pollutant	Fuel(s)	Hours/Year	Allowable Emissions			Equivalent Emissions*		Regulatory Citation(s)	See permit condition(s)
			Standard	lbs./hr	TPY	lbs./hour	TPY		
VE		8760	< 20% opacity					62-296.320 (4)(b) 1 F.A.C.	D.3.

Notes:  
 \* The "Equivalent Emissions" listed are for informational purposes only.

**Table 2-1, Summary of Compliance Requirements**

**A. Duda & Sons, Inc.**  
**Citrus Belle**

**DRAFT Permit No.: 0510004-001-AV**  
**Facility ID No.: 0510004**

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

<b>E.U. ID No.</b>	<b>Brief Description</b>
003	Boiler No. 2, 750 HP
007	Boiler No. 5, 1000 HP

Pollutant	Fuel(s)	Compliance Method	Testing Time Frequency	Frequency Base Date *	Min. Compliance Test Duration	CMS**	See permit condition(s)
CO	0.6 % fuel oil natural gas	EPA Method 10	annually	April 12th	3 - 1 hr. runs		A.2., A.6.(a), Subsection E
NOx	0.6 % fuel oil natural gas	EPA Method 7E	annually	April 12th	3 - 1 hr. runs		A.2., A.6.(b), Subsection E
PM10	0.6 % fuel oil natural gas	EPA Method 5	annually	April 12th	3 - 1 hr. runs		A.2., A.6.(c), Subsection E
SO2	0.6 % fuel oil natural gas	Fuel oil analysis Recordkeeping	each delivery		N/A		A.2., A.6.(d), A.7., Subsection E
VE	0.6 % fuel oil natural gas	EPA Method 9	annually	April 12th	1 - 1 hr. runs		A.2., A.6.(e), Subsection E
VOC	0.6 % fuel oil natural gas	EPA Method 25A	annually	April 12th	3 - 1 hr. runs		A.2., A.6.(f), Subsection E

**Notes:**

\* The frequency base date is established for planning purposes only; see Rule 62-297.310, F.A.C.

\*\* CMS [=] continuous monitoring system

\*\*\* Tests shall be conducted annually within 60 days of the established frequency base date.

**Table 2-1, Summary of Compliance Requirements**

**A. Duda & Sons, Inc.  
Citrus Belle**

**DRAFT Permit No.: 0510004-001-AV  
Facility ID No.: 0510004**

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

**E.U. ID No.            Brief Description**  
008                      Peel Dryer/Waste Heat Evaporator

Pollutant	Fuel(s)	Compliance Method	Testing Time Frequency	Frequency Base Date *	Min. Compliance Test Duration	Compliance	
						CMS**	See permit condition(s)
CO	0.6 % fuel oil natural gas	EPA Method 10 Recordkeeping	annually	***	3 - 1 hr. runs		B.6.(a), B.11 Subsection E
NOx	0.6 % fuel oil natural gas	EPA Method 7E Recordkeeping	annually	***	3 - 1 hr. runs		B.6.(c), B.11. Subsection E
PM10	0.6 % fuel oil natural gas	EPA Method 5 Recordkeeping	annually	***	3 - 1 hr. runs		B.6.(b), B.9., B.11. Subsection E
SO2	0.6 % fuel oil natural gas	Fuel oil analysis Recordkeeping	each delivery	***	N/A		B.6.(d), B.10., B.11. Subsection E
VE	0.6 % fuel oil natural gas	EPA Method 9 Recordkeeping	annually	***	1 - 1 hr. runs		B.6.(e), B.9., B.11. Subsection E
VOC	0.6 % fuel oil natural gas	EPA Method 25A Recordkeeping	annually	***	3 - 1 hr. runs		B.6.(f), B.11. Subsection E

**Notes:**

\* The frequency base date is established for planning purposes only; see Rule 62-297.310, F.A.C.

\*\* CMS [=] continuous monitoring system

\*\*\* Tests shall be conducted annually alternating each year between early/mid fruit or grapefruit processing and during Valencia fruit processing.

**Table 2-1, Summary of Compliance Requirements**

**A. Duda & Sons, Inc.**  
**Citrus Belle**

**DRAFT Permit No.: 0510004-001-AV**  
**Facility ID No.: 0510004**

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

**E.U. ID No.**      **Brief Description**  
 009                      Pellet Cooler

Pollutant	Fuel(s)	Compliance Method	Testing Time Frequency	Frequency Base Date *	Min. Compliance Test Duration	CMS**	See permit condition(s)
PM10		EPA Method 5	annually		3 - 1 hr. runs		C.4.(a), Subsection E
VE		EPA Method 9	annually		1 - 1 hr. runs		C.4.(b), Subsection E
VOC		EPA Method 25A	annually		3 - 1 hr. runs		C.4.(c), Subsection E

Notes:  
 \* The frequency base date is established for planning purposes only; see Rule 62-297.310, F.A.C.  
 \*\*CMS [=] continuous monitoring system  
 \*\*\* Tests shall be conducted annually alternating each year between early/mid fruit or grapefruit processing and during Valencia fruit processing.

**Table 2-1, Summary of Compliance Requirements**

**A. Duda & Sons, Inc.**  
**Citrus Belle**

**DRAFT Permit No.: 0510004-001-AV**  
**Facility ID No.: 0510004**

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

**E.U. ID No.**      **Brief Description**  
 010                  Lime Silo

Pollutant Name or Parameter	Fuel(s)	Compliance Method	Testing Time Frequency	Frequency Base Date *	Min. Compliance Test Duration	CMS**	See permit condition(s)

**Notes:**  
 \* The frequency base date is established for planning purposes only; see Rule 62-297.310, F.A.C.  
 \*\* CMS [=] continuous monitoring system  
 \*\*\* The initial test has not been conducted.