



# Department of Environmental Protection

Jeb Bush  
Governor

Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

David B. Struhs  
Secretary

## PERMITTEE

A. Duda & Sons, Inc.  
6000 State Road 29 South  
LaBelle, Florida 33935

<b>Permit No.</b>	0510004-005-AC
<b>Project</b>	Amended Testing Requirements
<b>SIC No.</b>	2037
<b>Expires:</b>	^DRAFT

## Authorized Representative:

Charles Nelson, General Manager

## PROJECT AND LOCATION

This permit authorizes changes to air compliance testing requirements and the test schedule for the existing boilers (E.U. ID -003 and -007), the peel dryer/waste heat evaporator (E.U. ID -008) and the pellet cooler (E.U. ID -009); and, to incorporate a change to the control device for the lime storage silo (E.U. ID -010) at 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.

## STATEMENT OF BASIS

This construction permit is issued under the provisions of Chapter 403 of the Florida Statutes (F.S.), and the Florida Administrative Code (F.A.C.) Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297. The above named permittee is authorized to construct the emissions units in accordance with the conditions of this permit and as described in the application, approved drawings, plans, and other documents on file with the Department of Environmental Protection (Department).

## APPENDICES

The attached appendix is a part of this permit:

Appendix GC General Permit Conditions

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Michael G. Cooke, Director  
Division of Air Resource  
Management

*"More Protection, Less Process"*

*Printed on recycled paper.*

**AIR CONSTRUCTION PERMIT**  
**SECTION I. FACILITY INFORMATION**

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**FACILITY AND PROJECT DESCRIPTION**

The facility is an existing citrus juice processing facility. The project is for a permit amendment to change air compliance testing requirements and the test schedule for the existing boilers (E.U. ID -003 and -007), the peel dryer/waste heat evaporator (E.U. ID -008) and the pellet cooler (E.U. ID -009); and, to incorporate a change to the control device for the lime storage silo (E.U. ID -010). The permittee requests that the testing requirements for the boilers conform to the requirements found in Rules 62-296.406 and 62-297.310, F.A.C.; and, the test frequency for the peel dryer/waste heat evaporator and the pellet cooler conform to the test frequency requirements of Rule 62-297.310, F.A.C. The facility information, project scope, emissions and rule applicability are described in detail in the Department's Technical Evaluation and Determination.

**REVIEWING AND PROCESS SCHEDULE**

January 21, 2004	Received permit application (no application fee required)
January 21, 2004	Application complete
	Distributed Notice of Intent to Issue and supporting documents
	Notice of Intent published in XXXX

**RELEVANT DOCUMENTS**

The documents listed below are the basis of the permit. They are specifically related to this permitting action. These documents are on file with the Department.

- Permit application
- Department's Technical Evaluation and Determination
- Department's Intent to Issue

## AIR CONSTRUCTION PERMIT

### SECTION II. FACILITY-WIDE SPECIFIC CONDITIONS

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The following specific conditions apply to all emissions units at this facility addressed by this permit. These conditions shall revise and supplement conditions imposed by previous permitting actions. Except for the conditions of this subsection, no other conditions of previous permitting actions shall be changed by this permit.

#### ADMINISTRATIVE

1. Regulating Agencies: All documents related to applications for permits to construct, operate or modify an emissions unit should be submitted to the Bureau of Air Regulation (BAR), Florida Department of Environmental Protection at Mail Station #5505, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, phone number 850/488-0114. All documents related to reports, tests, minor modifications and notifications shall be submitted to the Department's Central District office at 3319 Maguire Blvd., Suite 232, Orlando, Florida 32803-3767, and phone number 407/894-7555.
2. General Conditions: The owner and operator is subject to and shall operate under the attached General Permit Conditions G.1 through G.15 listed in Appendix GC of this permit. General Permit Conditions are binding and enforceable pursuant to Chapter 403, F.S. [Rule 62-4.160, F.A.C.]
3. Terminology: The terms used in this permit have specific meanings as defined in the corresponding chapters of the Florida Administrative Code.
4. Applicable Regulations, Forms and Application Procedures: Unless otherwise indicated in this permit, the construction and operation of the subject emissions unit shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of Chapter 403, F.S.; Chapters 62-4, 62-110, 62-204, 62-212, 62-213, 62-296, 62-297, F.A.C.; and, the Code of Federal Regulations Title 40, Part 60, adopted by reference in the Florida Administrative Code (F.A.C.) regulations. The permittee shall use the applicable forms listed in Rule 62-210.900, F.A.C. and follow the application procedures in Chapter 62-4, F.A.C. Issuance of this permit does not relieve the facility owner or operator from compliance with any applicable federal, state, or local permitting or regulations. [Rules 62-204.800, 62-210.300 and 62-210.900, F.A.C.]
5. New or Additional Conditions: Pursuant to Rule 62-4.080, F.A.C., for good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]
6. Expiration: This air construction permit shall expire on ^DRAFT. The permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the Department's Bureau of Air Regulation prior to 60 days before the expiration of the permit. [Rules 62-210.300(1), 62-4.070(4), 62-4.080, and 62-4.210, F.A.C.]
7. Modifications: No emissions unit or facility subject to this permit shall be constructed or modified without obtaining an air construction permit from the Department. Such permit must be obtained prior to the beginning of construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]
8. Title V Operation Permit Required: This permit authorizes construction and/or installation of the permitted emissions unit and initial operation to determine compliance with Department rules. A revision to the Title V operation permit is required for regular operation of the permitted emissions

## AIR CONSTRUCTION PERMIT

### SECTION II. FACILITY-WIDE SPECIFIC CONDITIONS

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unit. The owner or operator shall apply for a Title V operation permit at least ninety days prior to expiration of this permit, but no later than 180 days after commencing operation. To apply for a Title V operation permit, the applicant shall submit the appropriate application form, compliance test results, and such additional information as the Department may by law require. The application shall be submitted to the Department's Central District office. [Rules 62-4.030, 62-4.050, 62-4.220, and Chapter 62-213, F.A.C.]

#### OPERATIONAL REQUIREMENTS

9. Plant Operation - Problems: If temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by hazard of fire, wind or by other cause, the permittee shall immediately notify the Department's Central District office. The notification shall include pertinent information as to the cause of the problem, and what steps are being taken to correct the problem and to prevent its recurrence, and where applicable, the owner's intent toward reconstruction of destroyed facilities. Such notification does not release the permittee from any liability for failure to comply with Department rules. [Rule 62-4.130, F.A.C.]
10. Circumvention: No person shall circumvent any air pollution control device or allow the emission of air pollutants without the applicable air pollution control device operating properly. [Rule 62-210.650, F.A.C.]
11. Excess Emissions: This permit does not change any authorization for excess emissions provided by other Department permits. [Rule 62-210.700(5), F.A.C.]

#### COMPLIANCE MONITORING AND TESTING REQUIREMENTS

12. Determination of Process Variables: [Rule 62-297.310(5), F.A.C.]
  - (a) Required Equipment. The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.
  - (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.

#### REPORTING AND RECORD KEEPING REQUIREMENTS

13. Duration of Record Keeping: Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least five years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule. [Rules 62-4.160(14)(a)&(b) and 62-213.440(1)(b)2.b., F.A.C.]

**AIR CONSTRUCTION PERMIT**

**SECTION II. FACILITY-WIDE SPECIFIC CONDITIONS**

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14. Excess Emissions Report: In case of excess emissions resulting from malfunction, the owner or operator shall notify the Department's Central District office within one working day of: the nature, extent, and duration of the excess emissions; the cause of the excess emissions; and the actions taken to correct the problem. In addition, the Department may request a written summary report of the incident. A full written report on the malfunctions shall be submitted in a quarterly report if requested by the Department. [Rules 62-4.130 and 62-210.700(6), F.A.C.]
15. Annual Operating Report for Air Pollutant Emitting Facility: The Annual Operating Report for Air Pollutant Emitting Facility shall be completed each year and shall be submitted to the Department's Central District office and, if applicable, the appropriate local program by March 1 of the following year. [Rule 62-210.370(3), F.A.C.]

## AIR CONSTRUCTION PERMIT

### SECTION III. EMISSIONS UNITS SPECIFIC CONDITIONS

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The following specific conditions apply to the following emissions units after construction. These conditions shall revise and supplement conditions imposed by previous permitting actions. Except for the conditions of this section, no other conditions of previous permitting actions shall be changed by this permit.

#### **Subsection A. This section addresses the following emissions unit(s).**

<u>E.U. ID 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(s): These emissions units are regulated under: Rule 62-296.406, F.A.C., Fossil Fuel Steam Generators with Less than 250 million Btu per Hour Heat Input}

#### **The following specific conditions apply to the emissions unit(s) 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.

## AIR CONSTRUCTION PERMIT

### SECTION III. EMISSIONS UNITS SPECIFIC CONDITIONS

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[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]

#### **Emission Limitations and Standards**

**A.5.1 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.

[Rule 62-296.406, F.A.C.]

**A.5.2.** The emissions limitations below are for informational purposes, only in order 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 (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) **Volatile Organic Compound Emissions (VOC).** Volatile organic compound emissions shall not exceed 0.003 pounds per MMBtu of heat input.

[Construction Permit 0510004-005-AC; and, BACT dated March 1, 2000]

#### **Test Methods and Procedures**

**A.6. Visible Emissions.** The test method for visible emissions shall be DEP Method 9, incorporated in Chapter 62-297, F.A.C.

[Rule 62-297.401(9)(a), F.A.C.]

#### **Recordkeeping 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.

**AIR CONSTRUCTION PERMIT**

**SECTION III. EMISSIONS UNITS SPECIFIC CONDITIONS**

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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.

[Construction Permit 0510004-002-AC]

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



**AIR CONSTRUCTION PERMIT**

**SECTION III. EMISSIONS UNITS SPECIFIC CONDITIONS**

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The following specific conditions apply to the following emissions units after construction. These conditions shall revise and supplement conditions imposed by previous permitting actions. Except for the conditions of this section, no other conditions of previous permitting actions shall be changed by this permit.

**Subsection B. This section addresses the following emissions unit(s).**

<u>E.U. ID No.</u>	<u>Brief Description</u>
-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, 422.3.

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 and 62.296.320(4)(b)1, F.A.C.}

**The following specific conditions apply to the emissions unit(s) 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.]

## AIR CONSTRUCTION PERMIT

### SECTION III. EMISSIONS UNITS SPECIFIC CONDITIONS

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**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]

#### **Emission Limitations and Standards**

**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 (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.
- f) Volatile Organic Compounds (VOC). Volatile organic compound emissions shall not exceed 112.6 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; BACT dated March 1, 2000; and, Construction Permit 051004-003-AC, Effective Date: January 3, 2002]

#### **Test Methods and Procedures**

**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.
- 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.
- 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.
- 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.

A Duda & Sons / Citrus Belle  
Amended Testing Requirements

0510004-005-AC

## AIR CONSTRUCTION PERMIT

### SECTION III. EMISSIONS UNITS SPECIFIC CONDITIONS

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e) Visible Emissions. The test method for visible emissions shall be EPA Method 9, incorporated in Chapter 62-297, F.A.C.

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.

g) 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.

[Construction Permit 0510004-005-AC]

#### **Monitoring of Operations**

**B.7.** 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.  
[Construction Permit 0510004-002-AC]

#### **Continuous Monitoring Requirements**

**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]

#### **Recordkeeping 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.

## AIR CONSTRUCTION PERMIT

### SECTION III. EMISSIONS UNITS SPECIFIC CONDITIONS

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- 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.

[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.

[Construction Permit 0510004-002-AC]

**B.12.** This emission unit is also subject to Specific Conditions **E.1.** through **E.8.** contained in **Subsection E. Common Conditions.**

**AIR CONSTRUCTION PERMIT**

**SECTION III. EMISSIONS UNITS SPECIFIC CONDITIONS**

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The following specific conditions apply to the following emissions units after construction. These conditions shall revise and supplement conditions imposed by previous permitting actions. Except for the conditions of this section, no other conditions of previous permitting actions shall be changed by this permit.

**Subsection C. This section addresses the following emissions unit(s).**

<u>E.U. ID No.</u>	<u>Brief Description</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, 56.3. 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(s) 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)and 62-210.200(PTE), F.A.C.; and, Construction Permit 0510004-002-AC]

**C.2. Hours of Operation.** The hours of operation for this emission 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]

**Emission Limitations and Standards**

- 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.  
[Construction Permit 0510004-002-AC]
  - b) Visible Emissions. Visible emissions shall not be equal to or exceed 20 percent opacity.

A Duda & Sons / Citrus Belle  
Amended Testing Requirements

0510004-005-AC

**AIR CONSTRUCTION PERMIT**  
**SECTION III. EMISSIONS UNITS SPECIFIC CONDITIONS**

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

c) Volatile Organic Compound Emissions. Emissions from the pellet cooler shall not exceed 15.0 pounds per thousand boxes.

[Rule 62-213.440, F.A.C.; and, Construction Permit 0510004-003-AC]

**Test Methods and Procedures**

**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.

b) Visible emissions. The test method for visible emissions shall be EPA Method 9, incorporated in Chapter 62-297, F.A.C.

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.

[Construction Permit 0510004-005-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.

[Construction Permit 0510004-002-AC]

**C.6.** This emission unit is also subject to Specific Conditions **E.1.** through **E.8.** contained in **Subsection E. Common Conditions.**

**AIR CONSTRUCTION PERMIT**  
**SECTION III. EMISSIONS UNITS SPECIFIC CONDITIONS**

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The following specific conditions apply to the following emissions units after construction. These conditions shall revise and supplement conditions imposed by previous permitting actions. Except for the conditions of this section, no other conditions of previous permitting actions shall be changed by this permit.

**Subsection D. This section addresses the following emissions unit(s).**

<u>E.U. ID No.</u>	<u>Brief Description</u>
-010	Lime Storage Silo

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

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

**Emission Limitations and Standards**

**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]

**D.4.** In order to comply with Specific Condition **D.3.**, the permittee shall perform visible inspections of the emissions control device prior to and during the loading operation.  
[Construction Permit 0510004-005-AC]

**Test Methods and Procedures**

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

A Duda & Sons / Citrus Belle  
Amended Testing Requirements

0510004-005-AC

**AIR CONSTRUCTION PERMIT**  
**SECTION III. EMISSIONS UNITS SPECIFIC CONDITIONS**

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- a) The test method for visible emissions shall be EPA Method 9 incorporated in Chapter 62-297, F.A.C.
- 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.

[Construction Permit 0510004-005-AC]

**Recordkeeping 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 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.

[Construction Permit 0510004-005-AC]

**D.7.** This emission unit is also subject to Specific Conditions **E.1.** through **E.8.** contained in **Subsection E. Common Conditions.**



## AIR CONSTRUCTION PERMIT

### SECTION III. EMISSIONS UNITS SPECIFIC CONDITIONS

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The following specific conditions apply to the following emissions units after construction. These conditions shall revise and supplement conditions imposed by previous permitting actions. Except for the conditions of this section, no other conditions of previous permitting actions shall be changed by this permit.

#### Subsection E. Common Conditions.

<u>E.U. ID No.</u>	<u>Brief Description</u>
-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

#### The following conditions apply to the emissions unit(s) listed above:

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.]

**AIR CONSTRUCTION PERMIT**  
**SECTION III. EMISSIONS UNITS SPECIFIC CONDITIONS**

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**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]

## AIR CONSTRUCTION PERMIT

### SECTION III. EMISSIONS UNITS SPECIFIC CONDITIONS

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**E.6. Frequency of Compliance Tests.** The following provisions apply only to those emissions units that are subject to an emissions limiting standard for which compliance testing is required.

(a) General Compliance Testing.

2. For excess emission limitations for particulate matter specified in Rule 62-210.700, F.A.C., a compliance test shall be conducted annually while the emissions unit is operating under soot blowing conditions in each federal fiscal year during which soot blowing is part of normal emissions unit operation, except that such test shall not be required in any federal fiscal year in which a fossil fuel steam generator does not burn liquid for more than 400 hours other than during startup.

3. The owner or operator of an emissions unit that is subject to any emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining a renewed operation permit. Emissions units that are required to conduct an annual compliance test may submit the most recent annual compliance test to satisfy the requirements of this provision. In renewing an air operation permit pursuant to Rule 62-210.300(2)(a)3.b., c., or d., F.A.C., the Department shall not require submission of emission compliance test results for any emissions unit that, during the year prior to renewal:

a. Did not operate; or

b. In the case of a fuel burning emissions unit, burned liquid fuel for a total of no more than 400 hours.

4. During each federal fiscal year (October 1 - September 30), unless otherwise specified by rule, order, or permit, the owner or operator of each emissions unit shall have a formal compliance test conducted for:

a. Visible emissions, if there is an applicable standard;

b. Each of the following pollutants, if there is an applicable standard, and if the emissions unit emits or has the potential to emit: 5 tons per year or more of lead or lead compounds measured as elemental lead; 30 tons per year or more of acrylonitrile; or 100 tons per year or more of any other regulated air pollutant; and

c. Each NESHAP pollutant, if there is an applicable emission standard.

5. An annual compliance test for particulate matter emissions shall not be required for any fuel burning emissions unit that, in a federal fiscal year, does not burn liquid fuel, other than during startup, for a total of more than 400 hours.

9. The owner or operator 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 owner or operator.

(b) Special Compliance Tests. When the department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it may require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the department.

(c) Waiver of Compliance Test Requirements. If the owner or operator of an emissions unit that is subject to a compliance test requirement demonstrates to the Department, pursuant to the procedure established in Rule 62-297.620, F.A.C., that the compliance of the emissions unit with an applicable weight emission limiting standard can be adequately determined by means other than the designated test procedure, such as specifying a surrogate standard of no visible emissions for particulate matter sources equipped with a bag house or specifying a fuel analysis for sulfur dioxide emissions, the Department shall waive the compliance test requirements for such emissions units and order that the alternate means

**AIR CONSTRUCTION PERMIT**

**SECTION III. EMISSIONS UNITS SPECIFIC CONDITIONS**

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of determining compliance be used, provided, however, the provisions of Rule 62-297.310(7)(b), F.A.C., shall apply.

[Rule 62-297.310(7), F.A.C.; and, SIP approved]

**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]

# Memorandum

# Florida Department of Environmental Protection

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TO: Trina Vielhauer  
THRU: Scott Sheplak *SS*  
FROM: Ed Svec *[Signature]*  
DATE: February 24, 2004  
SUBJECT: A. Duda & Sons, Inc. / Citrus Belle  
Amended Testing Requirements

Attached for approval and signature is an intent to issue an air construction permit to allow A. Duda & Sons, Inc. / Citrus Belle change air compliance testing requirements and the test schedule for the existing boilers (E.U. ID -003 and -007), the peel dryer/waste heat evaporator (E.U. ID -008) and the pellet cooler (E.U. ID -009); and, to incorporate a change to the control device for the lime storage silo (E.U. ID -010). The permittee requests that the testing requirements for the boilers conform to the requirements found in Rules 62-296.406 and 62-297.310, F.A.C.; and, the test frequency for the peel dryer/waste heat evaporator and the pellet cooler conform to the test frequency requirements of Rule 62-297.310, F.A.C. at their plant located at 6000 State Road 29 South, LaBelle, Hendry County, Florida 33935. There will be no emissions increase, so no PSD review is required.

I recommend your approval and signature.

February 24, 2004 is day 34 of the 90 day time clock.

Attachments

/es

**1 APPLICANT NAME AND ADDRESS**

A. Duda & Sons, Inc. / Citrus Belle  
6000 State Road 29 South  
LaBelle, Florida 33935

Authorized Representative: Charles Nelson, General Manager

**2 FACILITY DESCRIPTION, PROJECT DETAILS AND RULE APPLICABILITY**

The facility is an existing citrus juice processing facility. The project is for a permit amendment to change air compliance testing requirements and the test schedule for the existing boilers (E.U. ID -003 and -007), the peel dryer/waste heat evaporator (E.U. ID -008) and the pellet cooler (E.U. ID -009); and, to incorporate a change to the control device for the lime storage silo (E.U. ID -010). The permittee requests that the testing requirements for the boilers conform to the requirements found in Rules 62-296.406 and 62-297.310, F.A.C.; and, the test frequency for the peel dryer/waste heat evaporator and the pellet cooler conform to the test frequency requirements of Rule 62-297.310, F.A.C.

There is no increase in annual potential emissions associated with this project. The applicant indicated in the application that they are not requesting any change in the plant's processing capacity.

The proposed project is subject to preconstruction review requirements under the provisions of Chapter 403, F.S., and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297, F.A.C. The existing facility is located in an area designated, in accordance with Rule 62-204.340, F.A.C., as attainment or unclassifiable for the criteria pollutants ozone, PM<sub>10</sub>, carbon monoxide, SO<sub>2</sub>, nitrogen dioxide and lead. This facility is classified as a Major or Title V Source of air pollution, because emissions of at least one regulated air pollutant exceeds 100 tons per year (TPY). At this facility potential emissions of PM/PM<sub>10</sub>, NO<sub>x</sub>, SO<sub>2</sub>, CO and VOC exceed 100 TPY.

This facility is not within an industry included in the list of the 28 Major Facility Categories per Table 62-212.400-1 of Chapter 62-212, F.A.C. Because emissions are greater than 250 TPY for at least one criteria pollutant, the facility is also an existing Major Facility with respect to Rule 62-212.400, Prevention of Significant Deterioration (PSD). There is no net increase in emissions of any criteria pollutant as a result of this project. Therefore, the project is not subject to New Source Review (NSR) requirements of Rule 62-212.400, F.A.C.

An impact analysis was not required for this project because it is not subject to the requirements of NSR.

The facility is subject to the requirements of the current valid Title V permit that are not changed by this permitting action. It is also subject to the requirements of the state rules as indicated in this permit. This permitting action is not subject to any requirements under the New Source Performance Standards, 40 CFR 60, or any NESHAP requirements of 40 CFR 61 or 63.

**3 COMPLIANCE**

The compliance methods, previously specified by permit 0510004-004-AV, are affected by this permitting action. The emissions standards for the boilers (E.U. ID -003 and -007), with the exception of fuel sulfur content and visible emissions, are identified for informational purposes and these annual testing requirements are deleted. The test frequency for the peel dryer/waste heat evaporator (E.U. ID -008) and the pellet cooler (E.U. ID -009) is amended to eliminate the alternate testing requirement of early season fruit one year and late season fruit the following year. The test results have not supported a need to continue this schedule and the testing requirement will follow the rule requirement of testing during the fiscal year.

**4 PRELIMINARY DETERMINATION**

Based on the foregoing technical evaluation of the application and other available information, the Department has made a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations. The Department's preliminary determination is to issue the draft permit to allow the amended testing requirements, subject to the terms and conditions of the draft permit.

**5 FINAL DETERMINATION**

DRAFT^

**DETAILS OF THIS ANALYSIS MAY BE OBTAINED BY CONTACTING:**

Edward J. Svec, Engineer IV  
Department of Environmental Protection  
Bureau of Air Regulation  
Mail Station #5505  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400  
Telephone: 850/488-0114