



Jeb Bush  
Governor

# Department of Environmental Protection

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

David B. Struhs  
Secretary

March 8, 2004

Mr. Charles Nelson  
General Manager  
A. Duda & Sons, Inc. / Citrus Belle  
6000 SR 29 South  
LaBelle, Florida 33935

Re: Draft Air Construction Permit No.: 0510004-005-AC  
DRAFT Title V Air Operation Permit Revision Project No.: 0510004-006-AV  
Corrected Pages  
Citrus Belle Facility

Dear Mr. Nelson:

In response to a telephone conversation with John Koogler, I have enclosed two replacement pages for each of the above referenced permits. The pages correct a reference to a permit condition in Specific Condition B.9. and include the previously granted exception from particulate matter testing in Specific Condition C.4., which was inadvertently omitted. Please replace these pages to the draft permits prior to publishing the public notice.

If you have any other questions, please contact me at 850/921-8985.

Sincerely,

Edward J. Svec, Engineer IV  
Bureau of Air Regulation

Enclosures

cc: John Koogler, P.E., Koogler and Associates  
Ron Blackburn, DEP SD

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## 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.(c) 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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[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. A visible emissions test indicating no visible emissions (5 percent opacity) may be submitted in lieu of a particulate stack test.

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.**