

Memorandum

Florida Department of Environmental Protection

TO: Trina Vielhauer

THRU: Scott Sheplak *SS*

FROM: Edward Svec *ES*

DATE: February 24, 2004

SUBJECT: A. Duda & Sons, Inc. / Citrus Belle
Title V Permit Revision
0510004-006-AV

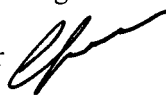
Attached for approval and signature is the intent to issue a Title V permit revision for A. Duda & Sons, Inc. / Citrus Belle. This permit revision authorizes changes to testing requirements established by permit 0510004-005-AC. The Statement of Basis contains a more detailed explanation of the changes.

February 24, 2004 is day 34 of the 90 day timeclock.

Attachments

/es

Florida's DRAFT Permit Electronic Notification Cover Memorandum

TO: Gracy Danois, U.S. EPA Region 4
CC: Jeananne Gettle, U.S. EPA Region 4
THRU: Scott Sheplak P.E., Bureau of Air Regulation
FROM: Edward J. Svec, Permit Engineer 
DATE: 03/01/2004
RE: U.S. EPA Region 4 DRAFT Title V Operation Permit Renewal Review

The following DRAFT Title V Renewal operation permit(s) and associated documents have been posted on the DEP World Wide Web Internet site for your review. Please provide any comments via Internet E-mail, to Scott Sheplak, at "Sheplak_S@dep.state.fl.us".

<u>Applicant Name</u>	<u>County</u>	<u>Method of Transmittal</u>	<u>Electronic File Name(s)</u>
A. Duda & Sons, Inc.	Hendry	INTERNET	0510004Rd.zip
A. Duda & Sons, Inc.			

This zipped file contains the following electronic files:

- sob.doc
- 0510004i.doc
- 0510004Rd.doc
- Table 1-1.doc
- Table 2-1.doc
- 0510004u.doc
- 0510004g.doc



Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

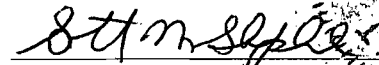
P.E. Certification Statement

Permittee:
A. Duda & Sons, Inc. – Citrus Belle Facility

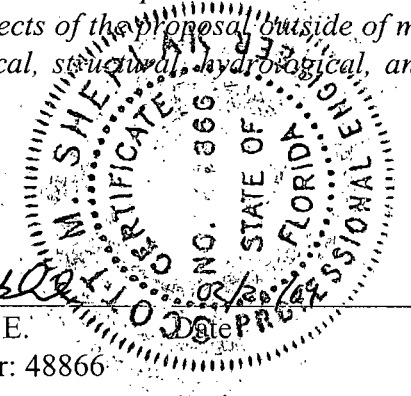
Permit No.: 0510004-005-AC
Permit No.: 0510004-006-AV

Project type: Air Construction Permit Amendment & Title V Permit Revision

I HEREBY CERTIFY that the engineering features described in the above referenced application and subject to the proposed permit conditions provide reasonable assurance of compliance with applicable provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 62-4 and 62-204 through 62-297. However, I have not evaluated and I do not certify aspects of the proposal outside of my area of expertise (including but not limited to the electrical, mechanical, structural, hydrological, and geological features).



Scott M. Sheplak, P.E.
Registration Number: 48866



Permitting Authority:
Department of Environmental Protection
Bureau of Air Regulation
111 South Magnolia Drive, Suite 4
Tallahassee, Florida 32301
Telephone: 850/921-9532
Fax: 850/922-6979

STATEMENT OF BASIS

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

Title V Air Operation Permit Revision
DRAFT Permit Project No.: 0510004-006-AV
Revision to Title V Air Operation Permit No.: 0510004-001-AV

The initial Title V Air Operation Permit, No. 0510004-001-AV, was issued/effective on October 24, 2000. This Title V Air Operation Permit Revision 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 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.

The subject of this permit revision is to incorporate the terms and conditions of air construction permit, No. 0510004-005-AC, changing 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 following changes are made:

FROM:

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 (NO_x). 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]

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]

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.

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.

[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]

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]

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 water barrel, which will be used to control particulate matter (lime dust) when loading lime pneumatically into the silo from trucks.

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]

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]

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]

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]

TO:

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 (SO2).** 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]

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.]

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.

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]

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]

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.

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]

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.
- 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]

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]

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 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]

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

Based on the initial Title V Air Operation Permit application received June 14, 1996, this facility is not a major source of hazardous air pollutants (HAPs).

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

Title V Air Operation Permit Revision

DRAFT Permit No.: 0510004-006-AV
Revision to Title V Air Operation Permit No.: 0510004-001-AV

Permitting Authority:

State of Florida
Department of Environmental Protection
Division of Air Resources Management
Bureau of Air Regulation
Mail Station #5505
2600 Blair Stone Road
Tallahassee, Florida 32399-2400
Telephone: 850/488-0114
Fax: 850/922-6979

Compliance 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

Title V Air Operation Permit Revision

DRAFT Permit No.: 0510004-006-AV

Revision to Title V Air Operation Permit No.: 0510004-001-AV

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Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

Permittee:

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

DRAFT Permit No.: 0510004-006-AV

Facility ID No.: 0510004

SIC No(s): 2037

Project: Title V Air Operation Permit Revision

This permit revision is being issued for the purpose of changing several Specific Conditions established in Title V Air Operation Permit, No. 0510004-004-AV, and based on an AC permitting action, No. 0510004-005-AC and located at the existing 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.

This Title V Air Operation Permit Revision 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 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.

Referenced attachments made a part of this permit:

Appendix U-1, List of Unregulated Emissions Units and/or Activities
Appendix I-1, List of Insignificant Emissions Units and/or Activities
APPENDIX TV-4, TITLE V CONDITIONS version dated 02/12/02
APPENDIX SS-1, STACK SAMPLING FACILITIES version dated 10/07/96
TABLE 297.310-1, CALIBRATION SCHEDULE version dated 10/07/96

Initial Effective Date: October 24, 2000

Revision Effective Date: (ARMS Day 55)

Renewal Application Due Date: April 24, 2005

Expiration Date: October 24, 2005

Michael G. Cooke, Director
Division of Air Resource
Management

MGC/sms/es

"More Protection, Less Process"

Printed on recycled paper.

Section I. Facility Information.

Subsection A. Facility Description.

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

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

Based on the initial Title V Air Operation Permit application received June 14, 1996, this facility is not a major source of hazardous air pollutants (HAPs).

Subsection B. Summary of Emissions Unit ID No(s). and Brief Description(s).

<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

-011	Emergency generator
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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

Statement of Basis

These documents are on file with the permitting authority:

Initial Title V Air Operation Permit issued October 24, 2000

Application for a Title V Air Operation Permit Revision received January 21, 2004

Letter dated January 20, 2004, changing the Responsible Official

Section II. Facility-wide Conditions.

The following conditions apply facility-wide:

1. APPENDIX TV-4, TITLE V CONDITIONS, is a part of this permit.
{Permitting note: APPENDIX TV-4, 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. Any Risk Management Plans, original submittals, revisions or updates to submittals, should be sent to:

RMP Reporting Center
Post Office Box 3346
Merrifield, VA 22116-3346
Telephone: 703/816-4434
- 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. General Pollutant Emission Limiting Standards. Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) Emissions. The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic

compounds (VOC) or organic solvents (OS) without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department.

“Nothing was deemed necessary and ordered at this time.”

[Rule 62-296.320(1)(a), F.A.C.; and, initial Title V permit application received June 14, 1996]

8. Emissions of Unconfined Particulate Matter. Pursuant to Rules 62-296.320(4)(c)1., 3. & 4., F.A.C., reasonable precautions to prevent emissions of unconfined particulate matter at this facility include the following requirements (see Condition 57. of APPENDIX TV-4, TITLE V CONDITIONS):

The following requirements are “not federally enforceable”:

- 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; and,
- 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.

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

9. 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.]

10. Statement of Compliance. The annual statement of compliance pursuant to Rule 62-213.440(3)(a)2., F.A.C., shall be submitted to the Department and EPA within 60 (sixty) days after the end of the calendar year using DEP Form No. 62-213.900(7), F.A.C.

[Rules 62-213.440(3) and 62-213.900, F.A.C.]

{Permitting Note: This condition implements the requirements of Rules 62-213.440(3)(a)2. & 3., F.A.C. (see Condition 51. of APPENDIX TV-4, TITLE V CONDITIONS)}

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 & Toxics Management Division
Air and EPCRA Enforcement Branch
Air Enforcement Section
61 Forsyth Street
Atlanta, Georgia 30303-8960
Telephone: 404/562-9155; Fax: 404/562-9163

13. Certification by Responsible Official (RO). In addition to the professional engineering certification required for applications by Rule 62-4.050(3), F.A.C., any application form, report, compliance statement, compliance plan and compliance schedule submitted pursuant to Chapter 62-213, F.A.C., shall contain a certification signed by a responsible official that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. Any responsible official who fails to submit any required information or who has submitted incorrect information shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary information or correct information.

[Rule 62-213.420(4), F.A.C.]

Section III. Emissions Unit(s) and Conditions.

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_x, 37.6; PM₁₀, 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.

[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

{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.}

{Permitting Note: Unless otherwise specified, the averaging time for Specific Condition **A.5.1.** is based on the specified averaging time of the applicable test method.}

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 (SO2).** 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

{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. 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.
- 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.**

Section III. Emissions Unit(s) and Conditions.

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_x, 23.5; PM₁₀, 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.]

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

{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.}

{Permitting Note: Unless otherwise specified, the averaging time for Specific Condition **B.5.** is based on the specified averaging time of the applicable test method.}

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) and 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]

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.
- 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.
 - 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.
[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.
- [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.
- 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.**

Section III. Emissions Unit(s) and Conditions.

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: PM₁₀, 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

{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.}

{Permitting Note: Unless otherwise specified, the averaging time for Specific Condition C.3. is based on the specified averaging time of the applicable test method.}

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 20 percent opacity.
[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

{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.
- 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.**

Section III. Emissions Unit(s) and Conditions.

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.
[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.}

{Permitting Note: Unless otherwise specified, the averaging time for Specific Condition D.3. is based on the specified averaging time of the applicable test method.}

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.]

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

{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.
- 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.**

Section III. Emissions Unit(s) and Conditions.

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.]

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. 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 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]

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

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

DRAFT Permit No.: 0510004-006-AV
Facility ID No.: 0510004

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’.

E.U. ID

<u>No.</u>	<u>Brief Description of Emissions Units and/or Activity</u>
-011	Emergency generator

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

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

DRAFT Permit No.: 0510004-006-AV
Facility ID No.: 0510004

The facilities, emissions units, or pollutant-emitting activities listed in Rule 62-210.300(3)(a), F.A.C., Categorical Exemptions, or that meet the criteria specified in Rule 62-210.300(3)(b)1., F.A.C., Generic Emissions Unit Exemption, are exempt from the permitting requirements of Chapters 62-210, 62-212 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 Rules 62-210.300(3)(a) and (b)1., 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 Rules 62-210.300(3)(a) and (b)1., 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

1. Pellet storage & handling
2. Fruit storage and handling
3. Juice extraction
4. Juice processing
5. Fuel oil storage tank
6. Facility maintenance activities
7. Waste water treatment system

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

A. Duda & Sons, Inc.
Citrus Belle

Permit No.: 0510004-006-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		
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)

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

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

A. Duda & Sons, Inc.
Citrus Belle

Permit No.: 0510004-006-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		112.6	422.3			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**

**Permit No.: 0510004-006-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	< 20% opacity in lieu of Method 5	0.56	2.1			62-213.440,F.A.C.	C.1., C.2., C.3.(a)
VE		8760						62-296.320 (4)(b)(1),F.A.C.	C.1., C.2., C.3.(b)
VOC		8760		15.0	56.3			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**

**Permit No.: 0510004-006-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**

**Permit No.: 0510004-006-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)	Compliance Method	Testing Time Frequency	Frequency Base Date *	Min. Compliance Test Duration	See permit condition(s)	
						CMS**	
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		1 - 1 hr. runs		A.2., A.6.(e), 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

Table 2-1, Summary of Compliance Requirements

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

**Permit No.: 0510006-004-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	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

Table 2-1, Summary of Compliance Requirements

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

**Permit No.: 0510006-004-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 - ½ hr. run		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

Table 2-1, Summary of Compliance Requirements

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

**Permit No.: 0510004-006-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)	Compliance	Testing Time	Frequency	Min. Compliance	CMS**	See permit condition(s)
		Method	Frequency	Base Date *	Test Duration		
VE		EPA Method 9	annually	***	30 minutes		D.4., D.5., 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
 *** The initial test has not been conducted.

Appendix H-1: Permit History

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

DRAFT Permit No.: 0510004-006-AV
Facility ID No.: 0510004

E.U. ID No.	Description	Permit No.	Effective Date	Expiration Date	Project Type ¹
All	Facility	0510004-001-AV	10/24/2000	10/24/2005	Initial
-003, -007, -008, -009, -010, -011	Boiler #2, Boiler #5, Peel Dryer, Pellet Cooler, Lime Silo, Emergency Generator	0510004-002-AC	05/03/2000	05/03/2005	Construction (mod.)
-008, -009	Peel Dryer, Pellet Cooler	0510004-003-AC	10/19/2000	10/19/2005	Construction (mod.)
All	Facility	0510004-004-AV	01/03/2002	10/24/2005	Revision
-003, -007, -008, -009, -010	Boiler #2, Boiler #5, Peel Dryer, Pellet Cooler, Lime Silo	0510004-005-AC	Pending ²	Pending ²	Construction (mod.)
All	Facility	0510004-006-AV	Pending ²	10/24/2005	Revision

¹ Project Type (select one): Title V: Initial, Revision, Renewal, or Admin. Correction; Construction (new or mod.); or, Extension (AC only).

² Change to an actual date, which is day 55 from the date of posting the PROPOSED Permit for EPA review (see confirmation e-mail from Tallahassee) or the date that EPA confirms resolution of any objections.