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Department of Environmental Protection

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

David B. Struhs Secretary

April 24, 2001

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. John Rees, President Silver Springs Citrus, Inc. PO Box 155 Howey-in-the-Hills, Florida 34737

Re: Extension of Expiration Date of Permit No 0690014-004-AC Distillate Fuel Oil Usage

The applicant, by letter from its consultant, Koogler and Associates, applied on April 23, 2001, to the Department for an extension of the expiration date of air construction permit number 0690014-004-AC to allow the use of very low sulfur distillate fuel oil in its existing process steam boiler #1 and citrus peel dryer at its existing entrus juice processing facility located at 25411 Mare Avenue, Howey-in-the-Hills, Lake County. The Department has reviewed the request. The expiration date is hereby extended from June 26, 2001 to October 31, 2001 to allow completion of physical construction and sufficient time for revision of the Title V permit.

A copy of this letter shall be filed with the referenced permit and shall become part of the permit. This permitting decision is issued pursuant to Chapter 403. Florida Statutes.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida, 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under section 120.60(3) of the Florida Statutes must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. Under section 120.60(3), however, any person who asked the Department for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under sections 120.569 and 120.57 F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205 of the Florida Administrative Code.

A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action, and (g) A statement of the relief sought

Silver Springs Citrus, Inc. DEP File No. 0690014-004-AC Page 2 of 3

by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation is not available in this proceeding.

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

The application for a variance or waiver is made by filing a petition with the Office of General Counsel of the Department. 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. The petition must specify the following information: (a) The name, address, and telephone number of the petitioner; (b) The name, address, and telephone number of the attorney or qualified representative of the petitioner, if any; (c) Each rule or portion of a rule from which a variance or waiver is requested. (d) The citation to the statute underlying (implemented by) the rule identified in (c) above; (e) The type of action requested: (f) The specific facts that would justify a variance or waiver for the petitioner; (g) The reason why the variance or waiver would serve the purposes of the underlying statute (implemented by the rule); and (h) A statement whether the variance or waiver is permanent or temporary and, if temporary, a statement of the dates showing the duration of the variance or waiver requested.

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

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

This permitting decision is final and effective on the date filed with the clerk of the Department unless a petition is filed in accordance with the above paragraphs or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition pursuant to Rule 62-110.106. F.A.C., and the petition conforms to the content requirements of Rules 28-106.201 and 28-106.301. F.A.C. Upon timely filing of a petition or a request for extension of time, this order will not be effective until further order of the Department.

Any party to this permitting decision (order) has the right to seek judicial review of it under section 120.68 of the Florida Statutes, by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel. Mail Station #35, 3900 Commonwealth Boulevard. Tallahassee. Florida, 32399-3000, and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within thirty days after this order is filed with the clerk of the Department.

Silver Springs Citrus, Inc. DEP File No. 0690014-004-AC Page 3 of 3

Executed in Tallahassee, Florida.

Howard L. Rhodes, Director Division of Air Resources Management

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this order was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 4/24/01 to the person(s) listed:

Mr. John Rees, Silver Springs Citrus, Inc. * Mr. John B. Koogler, Ph.D., P.E., K & A

Mr. Len Kozlov, P.E., DEP CD

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to §120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

Charlette Hayes 4/24/01 (Clerk)



KA 199-01-01

April 19, 2001



Mr. Joseph Kahn, P.E. Florida Department of Environmental Protection Twin Towers Office Building 2600 Blair Stone Rd Tallahassee, FL 32399-2400

Subject:

Permit Extension Request

Silver Springs Citrus, Inc. File No. 0690014-004-AC

Dear Mr. Kahn:

This is to request an extension of the above referenced construction permit until October 31, 2001, in order to allow sufficient time for DEP to process the Title V permit revision (copy of cover letter attached).

If you have any questions, please do not hesitate to call me.

Very truly yours,

KOOGLER & ASSOCIATES

John Koogler, Ph.D., P.E.

JBK:par Encl.

c: A. Zahm, FDEP J. Tyler, SSC



KA 199-01-01

April 19, 2001

Mr. Alan Zahm, P.E.
Florida Department of
Environmental Protection
3319 Maguire Blvd., Suite 232
Orlando, Florida 32803-3767

Subject:

Title V Permit Revision Silver Springs Citrus, Inc. File No. 0690014-002-AV

Dear Mr. Zahm:

Enclosed are four copies of the permit application to revise the above referenced Title V permit to include the provisions of the recently issued construction permit, 0690014-004-AC, which allows the use of diesel fuel in the peel dryer and Boiler No. 1.

Also, a request for an extension of the construction permit has been submitted under separate cover (copy attached) to Mr. Joseph Kahn at DARM office in Tallahassee, in order to allow sufficient time for the District office staff to process the Title V permit revision.

If you have any questions, please do not hesitate to call me.

Very truly yours,

KOOGLER & ASSOCIATES

Koogler, Ph.D., P.E.

JBK:par Encl.

c: J. Kahn, FDEP (w/o encl.)

J. Tyler, SSC

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
 Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 	A. Received by (Please Print Clearly) B. Date of Delivery Y-21-0 X Agent
Article Addressed to:	D. is delivery address different from item 1? Yes
Mr. John Rees, President Silver Springs Citrus, Inc. PO Box 155 Howey-in-the-Hills, FL 34737	✓ If YES, enter delivery address below □ No
	Service Type Certified Mail Registered Return Receipt for Merchandise C O D.
2. Artic	4. Restricted Delivery? (Extra Fee) ☐ Yes
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Endors Restric	eturn Pecs at Fee sement Required) atea Demient Fee			itrus
	Postage & Fees	\$		

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KA 199-00-03

January 3, 2001

Mr. Joseph Kahn, P.E. Florida Department of **Environmental Protection** Twin Towers Office Building 2600 Blair Stone Rd Tallahassee, FL 32399-2400

RECEIVED Bureau of Air Monitoring

& Mobile Sources

Subject: Alternate Fuel Request

Silver Spring Citrus, Inc.

Dear Mr. Kahn:

This is a follow up to your telephone conversation with Pradeep Raval regarding the urgent need for FDEP approval of the use of diesel fuel as an alternate fuel for the existing peel dryer and Boiler No. 1 at the Silver Spring Citrus facility.

Enclosed are four copies of a construction permit application in support of the request. We appreciate your treating this matter as an emergency as the facility is expecting a natural gas curtailment at any time due to the unexpectedly cold weather conditions this winter. As you are well aware this is occurring in the midst of the limited citrus processing season. A combination of skyrocketing costs associated with natural gas and the threat of curtailment would have a devastating impact on the facility.

If you have any questions or need any additional information, please immediately call Pradeep Raval or me.

Very truly yours.

KOOGLER & ASSOCIATES

Koogler, Ph.D., P.E.

JBK:par Enc.

c: J. Tyler, Silver Springs Citrus a, zakm, CD



PROJECT 199-00-03

NOOGLEE & ENVIRONMENTA 4014 NW THIRTE GAINESVILLE, FL 352/377-5822	<u>nl Services</u> Enth Street Orida 32609	<u>FAX TRANSMITTA</u>	AL_FORM	ς: -	Burcau o	20 t C E
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REMARKS:	N. gan	factors, 4 # 2 or have help.	fred or any Regard	9 vse l. Ca Ds! 76	el el	

This message is intended for use only by the individual to whom it has been addressed and may contain confidential or privileged information. If you are not the intended recipient, please note that the use, copying or distribution of this information is not permitted. If you have received this FAX in error, please destroy the original and notify the sender immediately at (352) 377-5822 so that we may prevent any recurrence. Thank you.

FDER TALL

Table 1.4-1. BMISSION FACTORS FOR NITROGEN OXIDES (NO.) AND CARBON MONOXIDE (CO) FROM NATURAL GAS COMBUSTION'

	, NO	1	CO		
Combustor Type (MMB1ts/hr Heat Input) [SCC]	Emission Factor (lb/10° scf)	Emission Pactor Railng	Emission Factor (Ib/10f scf)	Emission Factor Raling	
arge Wall-Fired Boilers		.,			
(> 00) 1-01-006-01, 1-02-006-01, 1-03-006-01]		·			
Uncontrolled (Pre-NSPS)	280	A 1	84	В	
Uncontrolled (Post-NSPS)*	190	A	14	В	
Controlled - Low NO, burners	140	A	84	9	
Controlled - Flue gas recirculation	100	D ·	84	В	
Small Bollers (<100) [I-01-006-02, I-02-006-02, 1-03-006-02, 1-03-006-03]					
Uncontrolled	100	В	B4 V	В	
Controlled - Low NO, burners	50	D	84	B	
Controlled - Low NO, burners/Flue gas recirculation	12	C	B4	В	
Tangantial-Fired Bollers (All Sizes) (1-01-006-04)					
Uncontrolled	170	A	24	Ċ	
Controlled - Flue gas recirculation	76	D	98	Ð	
Residential Furnaces (<0.3) [No SCC]					
Uncontrolled	. 94	В	40	B	

Reference 13. Units are in pounds of poliutant per million standard cubic feet of natural gas fired. To convert from 1b/10 sel to kg/10 m², multiply by 16. Emission factors are based on an average natural gas higher heating value of 1,020 Bm/sel. To convert from 1b/10 sel to 1b/MMBlu, divide by 1,020. The emission factors in this table may be converted to other natural gas heating values by multiplying the given emission factor by the ratio of the specified heating value to this average heating value. SCC = Source Classification Code. ND = no data. NA = not applicable.

Expressed as NO₂. For large and small wait fired bollers with SNCR control, apply a 24 percent reduction to the appropriate NO g emission factor.

Expressed as NO₂. For large and small wait fired bollers with SNCR control, apply a 24 percent reduction to the appropriate NO g emission factor.

INSPS=New Source Performance Standard as defined in 40 CFR 60 Subparts D and Db. Post-NSPS units are bollers with greater than 250 MMBlu/hr of heat input that commenced construction modification, or reconstruction after August 17, 1971, and units with heat input capacities between 100 and 250 MMBlu/hr that commenced construction modification, or reconstruction after June 19, 1984.

EMISSION COMBUSTION SOURCES

18:57

	<u> </u>	
Pollutant	Emission Factor (lb/10 ⁶ scf)	Emission Factor Rating
CO ₂ ^b	120,000	A
Lead	0.0005	D
N,O (Uncontrolled)	2.2	E
N ₂ O (Controlled-low-NO _x burner)	0.64	(E_m)
PM (Total) ^e	7.6 V	.D
PM (Condensable)*	5.7	D
PM (Filterable) ^c	1.9	В
so₂⁴	0.6	A
тос	11	В
Methane	2.3	В
voc	5.5 🗸	С

- Reference 11. Units are in pounds of pollutant per million standard cubic feet of natural gas fired. Data are for all natural gas combustion sources. To convert from lb/10⁶ sef to kg/10⁶ m³, multiply by 16. To convert from lb/10⁶ sef to 1b/MMBtu, divide by 1,020. The emission factors in this table may be converted to other natural gas heating values by multiplying the given emission factor by the ratio of the specified heating value to this average heating value. TOC = Total Organic Compounds.
 VOC = Volatile Organic Compounds.
- ^b Based on approximately 100% conversion of fuel carbon to CO_2 . $CO_2[Ib/10^6 \text{ scf}] = (3.67)$ (CON) (C)(D), where CON = fractional conversion of fuel carbon to CO_2 . C = carbon content of fuel by weight (0.76), and D = density of fuel, $4.2 \times 10^4 \text{ lb/} 10^6 \text{ scf}$.
- ^c All PM (total, condensible, and filterable) is assumed to be less than 1.0 micrometer in diameter. Therefore, the PM emission factors presented here may be used to estimate PM₁₀, PM₂₅ or PM₁ emissions. Total PM is the sum of the filterable PM and condensible PM. Condensible PM is the particulate matter collected using EPA Method 202 (or equivalent). Filterable PM is the particulate matter collected on, or prior to, the filter of an EPA Method 5 (or equivalent) sampling train.
- ⁴ Based on 100% conversion of fuel sulfur to SO₂.

 Assumes sulfur content is natural gas of 2,000 grains/10⁶ scf. The SO₂ emission factor in this table can be converted to other natural gas sulfur contents by multiplying the SO₂ emission factor by the ratio of the site-specific sulfur content (grains/10⁶ scf) to 2,000 grains/10⁶ scf.

1.3-4

Table 1.3-2 (English Units). CRITERIA POLLUTANT EMISSION FACTORS FOR UNCONTROLLED FUEL OIL COMBUSTION

		SO, •		\$O,¹		NO,		CO ^{s,t}		Filterable PM	
	Firing Configuration (SCC)	lb/10 ³ gal	EMISSION FACTOR RATING	lb/10 ³ gai	EMISSION FACTOR RATING	Ib/10° gat	EMISSION FACTOR RATING	lb/10 ³ gai	EMISSION PACTOR RATING	lb/10 ³ gal	EMISSION FACTOR RATING
100 F	Utility boders						-				
	No. 6 of fired, normal firing (1-01-004-01)	1578	A	5.78	c	67	· •	5	A	٠.	A
	No. 6 oil fired, rangential firing (1-01-004-04)	1578	A	5.78	C	42	٨	5	A	_,	A
9	No. 5 oil fired, normal firing (1-01-004-05)	157\$	A	5.7\$	c	67	٨	5	٨	*	В
EMISSION FACTORS	No. 5 oil fired, tangential firing (1-01-004-06)	1578	٨	5.78	c	42	٨	5	A	_h	В
S Z	No. 4 oll fired, normal firing (1-01-005-04)	150S	Å	5.78	c	எ	A	5	٨	h	В
ÄCI	No. 4 oil fired, tangential firing (1-01-005-05)	1508	٨	5. 7S	С	42	٨	5	A	_*	В
मा जिल्ल	Industrial boilers				_			ļ			
S	No. 6 oil fired (1-02-004-01/02/03)	1578	A	28	A	55	A	5	A		A
	No. 5 oil fired (1-02-004-04)	1575	Α	25	Α	55	. A	5	. A		В
	Distillate oil fired (1-02-005-01/02/03)	1425	✓ A	28	A	20	' . _A	س د	/		۸
	No. 4 oil fired (1-02-005-04)	1505	A	25	A	20	A	5	٨		В
101-1	Commercial/institutional/residential combustors										2
	No. 6 oil fired (1-03-004-01/02/03)	1578	A	28	A	55	٨	5	٨	_h	A
	No. 5 oil fired (1-03-004-04)	1578	A	25	A	55	Ā	. ا	Ā	ا ا	В
	Distillate oil fired (1-03-005-01/02/03)	1423	A	25	٨	20	٨	5	Ä	٠	A
	No. 4 of fired (1-03-005-04)	15 0S	A	2.5	A	20	Α	5	A	h	9
1/95	Residential furnace (No SCC)	1425	A	25	A	18	A	5	A	3	Α

Table 1.3-2 (cont.).

- ' SCC = Source Classification Code.
- ^b References 1-6,23,42-46. S indicates that the weight % of sulfur in the oil should be multiplied by the value given.
- References 1-5,45-46,22,
- References 3-4,10,15,24,42-46,48-49. Expressed as NO₂. Test results indicate that at least 95% by weight of NO₃ is NO for all boiler types except residential furnaces, where about 75% is NO. For utility vertical fired boilers use 105 lb/10³ gal at full load and normal (>15%) excess air. Nitrogen oxides emissions from residual oil combustion in industrial and commercial boilers are related to fuel nitrogen content, estimated by the following empirical relationship: lb NO₃/10³ gal = 20.54 + 104.39(N), where N is the weight percent of nitrogen in the oil.
- * References 3-5,8-10,23,42-46,48. CO emissions may increase by factors of 10 to 100 if the unit is improperly operated or not well maintained.
- ^c Emission factors for CO₂ from oil combustion should be calculated using 1b CO₂/10³ gal oil = 259 C (distillate) or 288 C (residual).
- * References 3-5,7,21,23-24,42-46,47,49. Filterable PM is that particulate collected on or prior to the filter of an EPA Method 5 (or equivalent) sampling train. PM-10 values include the sum of that particulate collected on the PM-10 filter of an EPA Method 201 or 201A sampling train and condensable emissions as measured by EPA Method 202.
- h Particulate emission factors for residual oil combustion are, on average, a function of fuel oil grade and sulfur content:

No. 6 oil: 9.19(S) + 3.22 lb/10 gal, where S is the weight % of sulfur in oll.

No. 5 oil: 10 lb/10³ gal No. 4 oil: 7 lb/10³ gal

No. 2 oil: 2 lb/103 gal 📞

Table 1.3-4 (English Units). EMISSION FACTORS FOR TOTAL ORGANIC COMPUTED (TOC), METHANE, AND NONMETHANE TOC (NMTOC) FROM UNCONTROLLED FUEL OIL COMBUSTION

	TOC		Ме	thane	NMTOC*		
Firing Configuration (SCC)*	1b/10³ gal	EMISSION FACTOR RATING	fb/10³ gai	EMISSION FACTOR RATING	ib/10° gai	EMISSION FACTOR RATING	
Utility boilers							
No. 6 oil fired, normal firing (1-01-004-01)	1.04	A .	0.28	A	0.76	A	
No. 6 oil fired, tangential fixing (1-01-004-04)	1.04	A	0.28	A	0.76	A	
No. 5 oil fired, normal firing (1-01-004-05)	1.04	A	0.28	A	0.76	A	
No. 5 oil fired, tangential firing (1-01-004-06)	1.04	A	0.28	, A	0.76	A	
No. 4 oil fired, normal firing (1-01-005-04)	1.04	A	0.28	A	0.76	A	
No. 4 oil fired, rangential firing (1-01-005-05)	1.04	A	0.28	A	0.76	A	
Industrial boilers			,				
No. 6 oil fired (1-02-004-01/02/03)	1,28	A	1	A	0.28	٨	
No. 5 oil fired (1-02-004-04)	1.28	Λ	1	A	0.28	A.	
Distillate oil fired (1-02-005-01/02/03)	0.252	A	0.052	۸	0.2 🗸	A	
No. 4 oil fired (1-02-005-04)	0.252	A	0.052	A	0.2	A	
Commercial/institutional/ residential combustors		7			•		
No. 6 oil fired (1-03-004-01/02/03)	1.605	^	0.475	A	1.13	A	
No. 5 oil fired (1-03-004-04)	1.605	A	0.475	^	1.13	A	
Distillate oil fired (1-03-005-01/02/03)	0.556	A	0.216	A	0.34	A	
No. 4 oil fired (1-03-005-04)	0.556	A	0.216	٨	0.34	A	
Residential furnace (No SCC)	2,493	Α	1.78	A	0.713	^	

^a SCC = Source Classification Code.

b References 16-19. Volatile organic compound emissions can increase by several orders of magnitude if the boiler is improperly operated or is not well maintained.