

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
NOTICE OF FINAL PERMIT

In the Matter of an  
Application for Permit by:

Mr. Bryce Kelly, General Operations Manager  
Cargill Citro-Pure, L.P.  
100 East 6<sup>th</sup> Street  
Frostproof, Florida 33843

DEP File No. 1050019-007-AC  
Boiler No. 2 Repairs  
Polk County

Enclosed is Final Permit Number 1050019-007-AC. This permit authorizes Cargill Citro-Pure, L.P. to perform after-the-fact repairs to Boiler No. 2, to increase its hours of operation and to fire natural gas and very low sulfur distillate fuel oil (0.05% sulfur by weight) at its existing facility located at 5<sup>th</sup> Street and U.S. Alternate Highway 27, Frostproof, Polk County. This permit is issued pursuant to Chapter 403, Florida Statutes.

Any party to this 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.

Executed in Tallahassee, Florida.



C. H. Fancy, P.E., Chief  
Bureau of Air Regulation

CERTIFICATE OF SERVICE

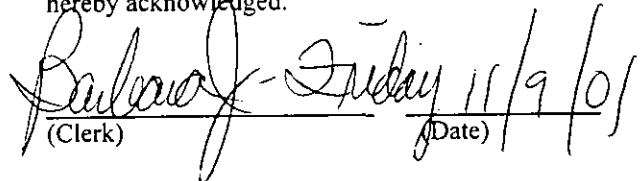
The undersigned duly designated deputy agency clerk hereby certifies that this Notice of Final Permit (including the Final permit) was sent by certified mail (\*) and copies were mailed by U.S. Mail before the close of business on 11/9/01 to the person(s) listed:

Mr. Bryce Kelly, Cargill Citro-Pure, L.P. \*  
Mr. David Buff, P.E., Golder Associates  
Mr. Bill Thomas, P.E., DEP SWD

11/9/01 cc = Ed Svec  
Reading File

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.

  
(Clerk) Friday 11/9/01  
(Date)

**SENDER: COMPLETE THIS SECTION**

- 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.

1. Article Addressed to:

Mr. Bryce Kelly  
 General Operations Manager  
 Cargill Citro-Pure, L.P.  
 100 East 6th Street  
 Frostproof, FL 33843

2. Article Number (Copy from service label)

7000 0520 0020 9371 1755

PS Form 3811 July 1999

Domestic Return Receipt

PSN 7535-00-M-0952

**COMPLETE THIS SECTION ON DELIVERY**

A. Received by (Please Print Clearly) B. Date of Delivery

Bob SAPP

11/13/01

C. Signature

X Bob Sapp

 Agent AddresseeD. Is delivery address different from item 1?  YesIf YES, enter delivery address below:  No

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**U.S. Postal Service**  
**CERTIFIED MAIL RECEIPT**  
 (Domestic Mail Only; No Insurance Coverage Provided)

Mr. Bryce Kelly

Postage \$

Certified Fee

Return Receipt Fee  
(Endorsement Required)Restricted Delivery Fee  
(Endorsement Required)

Total Postage &amp; Fees \$

Postmark  
Here

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Mr. Bryce Kelly

Street, Apt. No.; or PO Box No.

100 East 6th Street

City, State, ZIP+4

Frostproof, Florida 33843

PS Form 3800, February 2000

See Reverse for Instructions

# TECHNICAL EVALUATION AND DETERMINATION

## 1 APPLICANT NAME AND ADDRESS

Cargill Citro-Pure, L.P.  
100 East 6<sup>th</sup> Street  
Fostproof, Florida 33843

Authorized Representative: Bryce Kelly, General Operations Manager

## 2 FACILITY DESCRIPTION, PROJECT DETAILS AND RULE APPLICABILITY

The facility is an existing citrus juice processing facility. The project is an after-the-fact air construction permit for repairs to the existing No. 2 boiler, an E. Keeler Company boiler, manufactured in 1975, with a design rating of 50,000 pounds per hour steam and a design heat input rate of 64.9 MMBtu per hour, at the Fostproof facility. The repairs to the boiler included dismantling the existing steam tubes, installation of new steam tubes, and replacement of combustion chamber refractory, casing and insulation that was removed to gain access to the steam tubes. The applicant states that the repairs did not change the design capacity or design heat input rate of the boiler. In addition, the applicant has requested that the allowable hours of operation of Boiler No. 2 be increased from the currently permitted limit of 6,240 hours per any consecutive 12-month period to continuous operation (8,760 hours per year). In order to avoid PSD review for the increase in hours of operation, the applicant proposed to fire the boiler with natural gas and very low sulfur distillate fuel oil (0.05% sulfur by weight), rather than the currently permitted natural gas or new No. 2 fuel oil with a maximum sulfur content of 0.30%, by weight. The applicant did not seek any relaxation in currently enforceable conditions for its other existing emissions units.

The emissions unit addressed by this permit is Boiler No. 2, existing emissions unit I.D. -005.

The emissions increases associated with this project were estimated as follows in tons per year. No offsetting emissions were assumed in this estimate.

Pollutant	Net Increase <sup>1</sup>	PSD Significance	Subject to PSD?
PM/ PM <sub>10</sub>	3.80/2.16	25/15	No
SO <sub>2</sub>	12.10	40	No
NO <sub>x</sub>	39.31	40	No
CO	23.88	100	No
VOC	1.56	40	No

<sup>1</sup> Potential emissions (shown as net increase) were estimated by the Department from allowable natural gas and distillate fuel oil usage and AP-42 emission factors (tables 1.3-1 and 1.3-3 for fuel oil, tables 1.4-1 and 1.4-2 for natural gas), assuming a heat content of 1000 Btu/scf of natural gas and 136 million Btu/1000 gallons of distillate fuel oil, given a design heat input capacity of 64.9 mmBtu/hour, and the fuel use limits of the permit.

The proposed project is subject to preconstruction review requirements under the provisions of Chapter 403, F.S., and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297, F.A.C. The existing facility is located in an area designated, in accordance with Rule 62-204.340, F.A.C., as attainment or unclassifiable for the criteria pollutants ozone, PM<sub>10</sub>, carbon monoxide, SO<sub>2</sub>, nitrogen dioxide and lead. This facility is classified as a Major or Title V Source of air pollution because emissions of at least one regulated air pollutant exceeds 100 tons per year (TPY). The Department has previously found that citrus juice processing facilities such as this facility have potential emissions of VOC exceeding 250 TPY.

This facility is not within an industry included in the list of the 28 Major Facility Categories per Table 212.400-1 of Chapter 62-212, F.A.C. Because emissions are greater than 250 TPY for at least one criteria pollutant (VOC), the facility is also an existing Major Facility with respect to Rule 62-212.400, F.A.C., Prevention of Significant Deterioration (PSD). The net increase in emissions of PM/PM<sub>10</sub>, NO<sub>x</sub>, SO<sub>2</sub>, CO

and VOC do not exceed the PSD significance levels of Table 212.400-2 of Chapter 62-212, F.A.C. Therefore the project is not subject to PSD requirements of Rule 62-212.400, F.A.C., for these pollutants.

The process steam boiler is not subject to regulation under the New Source Performance Standards of 40 CFR 60, Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units, because the rebuild of the boiler is not considered a NSPS modification based upon the financial analysis provided to the Department's Southwest District office. This emissions unit is subject to a determination of Best Available Control Technology (BACT) pursuant to Rule 62-296.406, F.A.C. The applicant requested that BACT be determined to be the use of natural gas and 0.05%, by weight, sulfur distillate fuel oil. BACT for small boilers is typically the use of natural gas and 0.05%, by weight, sulfur distillate fuel oil, so the applicant's request is consistent with the Department's previous BACT determinations. The Department's determination for this project is that BACT shall be the use of natural gas as the primary fuel, with very low sulfur (0.05% by weight) fuel oil allowed as a backup fuel. Fuel oil use will be further limited to not exceed 7,125 hours per year.

The rationale for the Department's BACT determination is that sulfur in fuel is a primary air pollution concern, since most of the fuel sulfur becomes sulfur dioxide, and particulate matter emissions from fuel burning are related to the sulfur content. Reducing the allowable sulfur content of the fuels burned will reduce the emissions of sulfur dioxide and particulate matter. Natural gas has the lowest sulfur content of the typically available fuels. Burning of natural gas results in relatively lower emissions of other criteria pollutants as compared with firing fuel oil, with the exception of nitrogen oxides which are higher. Thus, for the majority of pollutants, including particulate matter and sulfur dioxide, the use of natural gas is the best alternative. Fuel oil is permitted as a backup fuel, although its use is limited because of its higher sulfur content.

The applicant stated that this facility is a major source of hazardous air pollutants (HAPs). This project is not subject to a case-by-case MACT determination, per Rule 62-204.800(10)(d)2, F.A.C., because it does not result in the construction or reconstruction of a major source of HAP emissions. This project is not subject to any requirements under the National Emissions Standards for Hazardous Air Pollutants, 40 CFR 61 or 63.

### **3 SOURCE IMPACT ANALYSIS**

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

### **4 EXCESS EMISSIONS**

Excess emissions for this emissions unit are specified in Section II of the permit. This permitting action does not change any authorization for excess emissions provided by other Department permits for other emissions units

### **5 LIMITS AND COMPLIANCE REQUIREMENTS**

The permit limits the sulfur content of the distillate fuel oil and limits the heat input to the emissions units from all permitted fuels. Specific emission limits were not imposed because the potential emissions are well below the PSD significance criteria. The fuel consumption limits and the compliance requirements are detailed in Section III of the permit.

### **6 PRELIMINARY DETERMINATION**

Based on the foregoing technical evaluation of the application and additional information submitted by the applicant and other available information, the Department has made a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations. The

Department's preliminary determination is to issue the draft permit to allow the rebuild of process steam boiler No. 2, subject to the terms and conditions of the draft permit.

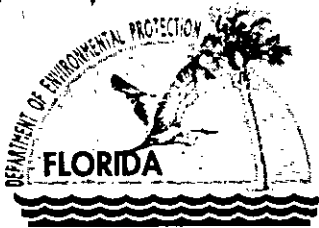
**7 FINAL DETERMINATION**

An "INTENT TO ISSUE AIR CONSTRUCTION PERMIT" to Cargill Citro-Pure for their existing citrus juice processing plant located at 5<sup>th</sup> Street and U.S. Alternate Highway 27, Frostproof, Polk County was clerked on October 12, 2001. The "PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT" was published in the Lakeland Ledger on October 22, 2001. The Draft Air Construction Permit was available for public inspection at the Southwest District office in Tampa and the permitting authority's office in Tallahassee. Proof of publication of the "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" was received on November 2, 2001.

Comments were received and the Draft Air Construction Permit was changed. The comments were not considered significant enough to reissue the Draft Air Construction Permit and require another Public Notice. Comments were received from one respondent, David Buff of Golder Associates, during the 14 (fourteen) day public comment period. The comments consisted of Scribner errors calling the **Keeler Company** boiler a **Keller Company** boiler in various places in the Draft permit and Technical Evaluation and Determination and the failure of a note following permit specific condition 3 to list the term **Btu** in the units cited for natural gas. These corrections were made in the Final Determination. As a result, the Final Air Construction permit will be issued with the changes discussed above.

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

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



Jeb Bush  
Governor

# Department of Environmental Protection

Marjory Stoneman Douglas Building  
3900 Commonwealth Boulevard  
Tallahassee, Florida 32399-3000

David B. Struhs  
Secretary

## PERMITTEE

Cargill Citro-Pure, L.P.  
100 East 6<sup>th</sup> Street  
Frostproof, Florida 33843

<b>Permit No.</b>	1050019-007-AC
<b>Project</b>	Boiler No. 2 Repair
<b>SIC No.</b>	2033, 2037, 2048
<b>Expires:</b>	January 31, 2002

## Authorized Representative:

Bryce Kelly, General Operations Manager

## PROJECT AND LOCATION

This permit authorizes Cargill Citro-Pure, L.P., Frostproof Plant, to perform repairs to the No. 2 process steam boiler with a physical capacity of 64.9 MMBtu/hour or less, increase the hours of operation, and fire natural gas and very low sulfur distillate fuel oil (0.05% sulfur by weight).

This facility is located at 5<sup>th</sup> Street and U.S. Alternate Highway 27, Frostproof, Polk County. The UTM coordinates are: Zone 17; 448.0 km E and 3068.5 km N.

## STATEMENT OF BASIS

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

## APPENDICES

The attached appendix is a part of this permit:

Appendix GC    General Permit Conditions

Howard L. Rhodes, Director  
Division of Air Resources  
Management

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

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**FACILITY AND PROJECT DESCRIPTION**

The facility is an existing citrus juice processing facility. The project is an after-the-fact air construction permit for repairs to the Frostproof Plant's existing No. 2 boiler, an E. Keeler Company boiler, manufactured in 1975, with a design rating of 50,000 pounds per hour steam and a design heat input rate of 64.9 MMBtu per hour, at the Frostproof facility. The repairs to the boiler included dismantling the existing steam tubes, installation of new steam tubes, and replacement of combustion chamber refractory, casing and insulation that was removed to gain access to the steam tubes. The applicant states that the repairs did not change the design capacity or design heat input rate of the boiler. In addition, the applicant has requested that the allowable hours of operation of Boiler No. 2 be increased from the currently permitted limit of 6,240 hours per any consecutive 12-month period to continuous operation (8,760 hours per year). In order to avoid PSD review for the increase in hours of operation, the applicant proposed to fire the boiler with natural gas and very low sulfur distillate fuel oil (0.05% sulfur by weight) rather than the currently permitted natural gas or new No. 2 fuel oil with a maximum sulfur content of 0.30% by weight. The applicant did not seek any relaxation in currently enforceable conditions in its other existing emissions units.

The annual potential emissions associated with this project in tons per year are approximately: PM/PM<sub>10</sub>, 3.80/2.16; NO<sub>x</sub>, 39.31; SO<sub>2</sub>, 12.10; CO, 23.88; and VOC, 1.56. The facility information, project scope, emissions and rule applicability are described in detail in the Department's Technical Evaluation and Determination.

**REVIEWING AND PROCESS SCHEDULE**

September 4, 2001	Received permit application (no application fee required)
September 4, 2001	Application complete
October 12, 2001	Distributed Notice of Intent to Issue and supporting documents
October 22, 2001	Notice of Intent published in The Ledger, Lakeland, Polk County, Florida

**RELEVANT DOCUMENTS**

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

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

**AIR CONSTRUCTION PERMIT**  
**SECTION II. FACILITY-WIDE SPECIFIC CONDITIONS**

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The following specific conditions apply to all emissions units at this facility addressed by this permit.

**ADMINISTRATIVE**

1. Regulating Agencies: All documents related to applications for permits to construct, operate or modify an emissions unit should be submitted to the Bureau of Air Regulation (BAR), Florida Department of Environmental Protection at Mail Station #5505, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, phone number 850/488-0114. All documents related to reports, tests, minor modifications and notifications shall be submitted to the Department's Southwest District office at 3804 Coconut Palm Drive, Tampa, Florida 33619-8218, and phone number 813/744-6100.
2. General Conditions: The owner and operator is subject to and shall operate under the attached General Permit Conditions G.1 through G.15 listed in Appendix GC of this permit. General Permit Conditions are binding and enforceable pursuant to Chapter 403 of the Florida Statutes(F.S.). [Rule 62-4.160, F.A.C.]
3. Terminology: The terms used in this permit have specific meanings as defined in the corresponding chapters of the Florida Administrative Code.
4. Applicable Regulations, Forms and Application Procedures: Unless otherwise indicated in this permit, the construction and operation of the subject emissions unit shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of Chapter 403, F.S., and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-110, 62-204, 62-212, 62-213, 62-296, 62-297 and the Code of Federal Regulations Title 40, Part 60, adopted by reference in the F.A.C. regulations. The permittee shall use the applicable forms listed in Rule 62-210.900, F.A.C., and follow the application procedures in Chapter 62-4, F.A.C. Issuance of this permit does not relieve the facility owner or operator from compliance with any applicable federal, state, or local permitting or regulations. [Rules 62-204.800, 62-210.300 and 62-210.900, F.A.C.]
5. New or Additional Conditions: Pursuant to Rule 62-4.080, F.A.C., for good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]
6. Expiration: This air construction permit shall expire on January 31, 2002. The permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the Department's Bureau of Air Regulation prior to 60 days before the expiration of the permit. [Rules 62-210.300(1), 62-4.070(4), 62-4.080, and 62-4.210, F.A.C.]
7. Modifications: No emissions unit or facility subject to this permit shall be constructed or modified without obtaining an air construction permit from the Department. Such permit must be obtained prior to the beginning of construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]
8. Title V Operation Permit Required: This permit authorizes construction and/or installation of the permitted emissions unit and initial operation to determine compliance with Department rules. A revision to the Title V operation permit is required for regular operation of the permitted emissions



**AIR CONSTRUCTION PERMIT**  
**SECTION II. FACILITY-WIDE SPECIFIC CONDITIONS**

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

**OPERATIONAL REQUIREMENTS**

9. Plant Operation - Problems: If temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by hazard of fire, wind or by other cause, the permittee shall immediately notify the Department's Southwest District office. The notification shall include pertinent information as to the cause of the problem, and what steps are being taken to correct the problem and to prevent its recurrence, and where applicable, the owner's intent toward reconstruction of destroyed facilities. Such notification does not release the permittee from any liability for failure to comply with Department rules. [Rule 62-4.130, F.A.C.]
10. Circumvention: No person shall circumvent any air pollution control device or allow the emission of air pollutants without the applicable air pollution control device operating properly. [Rule 62-210.650, F.A.C.]
11. Excess Emissions: This permit does not change any authorization for excess emissions provided by other Department permits for other emissions units. The following excess emissions provisions of state rule apply to this emissions unit (emissions unit 005) as specified below.
  - (a) Excess emissions resulting from start-up and shutdown are permitted for emissions unit 005 providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized, but in no case exceed two hours in any 24 hour period.
  - (b) Excess emissions resulting from malfunction of this emissions unit shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized, but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration.
  - (c) 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 start-up, shutdown, or malfunction shall be prohibited.

[Rules 62-210.700(1), (4) and (5), F.A.C.]

**AIR CONSTRUCTION PERMIT**  
**SECTION II. FACILITY-WIDE SPECIFIC CONDITIONS**

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**COMPLIANCE MONITORING AND TESTING REQUIREMENTS**

12. Determination of Process Variables: [Rule 62-297.310(5), F.A.C.]

- (a) **Required Equipment.** The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.
- (b) **Accuracy of Equipment.** Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.

**REPORTING AND RECORD KEEPING REQUIREMENTS**

- 13. Duration of Record Keeping: Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least five years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule. [Rules 62-4.160(14)(a) & (b) and 62-213.440(1)(b)2.b., F.A.C.]
- 14. Excess Emissions Report: In case of excess emissions resulting from malfunction, the owner or operator shall notify the Department's Southwest District office within one working day of: the nature, extent, and duration of the excess emissions; the cause of the excess emissions; and the actions taken to correct the problem. In addition, the Department may request a written summary report of the incident. A full written report on the malfunctions shall be submitted in a quarterly report if requested by the Department. [Rules 62-4.130 and 62-210.700(6), F.A.C.]
- 15. Annual Operating Report for Air Pollutant Emitting Facility: The Annual Operating Report for Air Pollutant Emitting Facility shall be completed each year and shall be submitted to the Department's Southwest District office and, if applicable, the appropriate local program by March 1 of the following year. [Rule 62-210.370(3), F.A.C.]

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

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The following specific conditions apply to the following emissions units after construction.

EMISSIONS UNIT NO.	EMISSIONS UNIT DESCRIPTION
005	Boiler No. 2

[Note: This emissions unit is a process steam boiler that is installed to serve as a source of steam to meet citrus processing needs. This boiler is limited to one of a physical capacity of 64.9 MMBtu/hour or less, that fires natural gas and very low sulfur distillate fuel oil (0.05% sulfur by weight). This emissions unit is subject to the requirements of the state rules as indicated in this permit. This emissions unit is subject to a determination of Best Available Control Technology pursuant to Rule 62-296.406, F.A.C. The fuel authorized by this permit is consistent with that BACT determination. This emissions unit is not subject to regulation under the New Source Performance Standards of 40 CFR 60, Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units.]

**STATE RULE REQUIREMENTS**

**OPERATIONAL REQUIREMENTS**

1. **Hours of Operation:** This emissions unit may operate up to 8,760 hours/year. [Rules 62-4.070(3) and 62-210.200, F.A.C., and limitation on potential to emit]
2. **Design Heat Input Capacity Limited:** The design heat input capacity of this emissions unit shall be limited to a maximum of 64.9 MMBtu per hour, based on the physical design and characteristics of the steam generation unit. [Rules 62-4.070(3) and 62-210.200, F.A.C., and limitation on potential to emit]
3. **Fuel Consumption Limited:** This emission unit shall primarily be fired with natural gas. Distillate fuel oil with a maximum sulfur content of 0.05 percent, by weight, may be used as a backup fuel. Natural gas consumption by this emissions unit shall not exceed 568.5 million standard cubic feet in any consecutive 12-month period. Distillate fuel oil consumption by this emissions unit shall not exceed 3,400 thousand gallons in any consecutive 12-month period. [Rules 62-4.070(3), 62-210.200 and 62-296.406, F.A.C., BACT for small boilers, and limitation on potential to emit]

[Note: This condition limits distillate fuel oil consumption to the equivalent of 7125 hours per year and does not limit the use of natural gas, assuming a heat input of 64.9 MMBtu/hour and an average heat value of 1000 MMBtu/million scf of natural gas and 136 MMBtu/1000 gallons of fuel oil.]

4. **Visible Emissions Limited:** Visible emissions from this emissions unit shall not exceed 20 percent opacity except for one two-minute period per hour during which opacity shall not exceed 40 percent. [Rule 62-296.406(1), F.A.C.]

## AIR CONSTRUCTION PERMIT

### SECTION III. EMISSIONS UNITS SPECIFIC CONDITIONS

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#### COMPLIANCE MONITORING AND TESTING REQUIREMENTS

5. Fuel Sulfur Content Tests: The owner or operator shall determine the sulfur content of each delivery of distillate fuel oil received for these emissions units using ASTM D4057-88, Standard Practice for Manual Sampling of Petroleum and Petroleum Products, and one of the following test methods for sulfur in petroleum products: ASTM D129-91, ASTM D1552-90, ASTM D2622-94, or ASTM D4294-90. A more recent version of these methods may be used. The owner or operator may comply with this requirement by receiving records from the fuel supplier that indicate the sulfur content of the distillate fuel oil delivered complies with the sulfur limit of specific condition 3 of this section. [Rules 62-4.070(3) and 62-297.440, F.A.C.]
6. Visible Emission Tests Required: The owner or operator shall demonstrate compliance with the visible emissions limit for this emissions unit upon initial installation and annually using EPA Method 9, as described in 40 CFR 60 Appendix A. [Rules 62-4.070(3) and 62-297.310, F.A.C.]

#### REPORTING AND RECORD KEEPING REQUIREMENTS

7. Fuel Sulfur Content Records: The owner or operator shall maintain records of sulfur content of each delivery of distillate fuel oil received for these emissions units, made pursuant to the requirements of specific condition 5 of this section. [Rule 62-4.070(3), F.A.C.]
8. Distillate Fuel Oil Consumption Records: The owner or operator shall make and maintain monthly records of natural gas and distillate fuel oil consumption for this emissions unit. From the monthly records of consumption of all permitted fuels, the owner or operator shall make records of the consecutive 12-month fuel consumption to demonstrate compliance with the fuel consumption limits of specific condition 3 of this section. All of these records shall be completed within ten days of the end of each month. [Rule 62-4.070(3), F.A.C.]
9. Records of Design Heat Input Capacity: The owner or operator shall maintain records of the design heat input capacity provided by the boiler's manufacturer or vendor to demonstrate compliance with condition 2 of this section. Such records shall be received prior to installation of this emissions unit, and shall be retained for each such emissions unit installed at the facility for a period of five years from the date of installation. [Rule 62-4.070(3), F.A.C.]

**APPENDIX GC**  
GENERAL PERMIT CONDITIONS [RULE 62-4.160, F.A.C.]

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- G.1 The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
- G.2 This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings or exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
- G.3 As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey and vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
- G.4 This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
- G.5 This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
- G.6 The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
- G.7 The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:
- (a) Have access to and copy and records that must be kept under the conditions of the permit;
  - (b) Inspect the facility, equipment, practices, or operations regulated or required under this permit, and,
  - (c) Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.
- Reasonable time may depend on the nature of the concern being investigated.
- G.8 If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:
- (a) A description of and cause of non-compliance; and
  - (b) The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

**APPENDIX GC**  
GENERAL PERMIT CONDITIONS [RULE 62-4.160, F.A.C.]

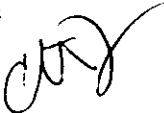
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The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

- G.9 In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.
- G.10 The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.
- G.11 This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.
- G.12 This permit or a copy thereof shall be kept at the work site of the permitted activity.
- G.13 This permit also constitutes:
- (a) Determination of Best Available Control Technology (X);
  - (b) Determination of Prevention of Significant Deterioration ( ); and
  - (c) Compliance with New Source Performance Standards ( ).
- G.14 The permittee shall comply with the following:
- (a) Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
  - (b) The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application or this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
  - (c) Records of monitoring information shall include:
    - 1. The date, exact place, and time of sampling or measurements;
    - 2. The person responsible for performing the sampling or measurements;
    - 3. The dates analyses were performed;
    - 4. The person responsible for performing the analyses;
    - 5. The analytical techniques or methods used; and
    - 6. The results of such analyses.
- G.15 When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

Florida Department of <sup>BAR</sup>  
Environmental Protection

Memorandum

TO: Howard Rhodes  
FROM: Clair Fancy   
DATE: November 5, 2001  
SUBJECT: Cargill Citro-Pure, L.P.  
Boiler No. 2 Repairs

Attached for approval and signature is a final after-the-fact air construction permit for repairs to the Frostproof Plant's existing No. 2 boiler, an E. Keeler Company boiler manufactured in 1975 with a design rating of 50,000 pounds per hour steam and a design heat input rate of 64.9 MMBtu per hour, at the Frostproof facility. The repairs to the boiler included dismantling the existing steam tubes, installation of new steam tubes, and replacement of combustion chamber refractory, casing and insulation that was removed to gain access to the steam tubes. The applicant states that the repairs did not change the design capacity or design heat input rate of the boiler. In addition, the applicant has requested that the allowable hours of operation of Boiler No. 2 be increased from the currently permitted limit of 6,240 hours per any consecutive 12-month period to continuous operation (8,760 hours per year). In order to avoid PSD review for the increase in hours of operation, the applicant proposed to fire the boiler with natural gas and very low sulfur distillate fuel oil (0.05% sulfur by weight) rather than the currently permitted natural gas or new No. 2 fuel oil with a maximum sulfur content of 0.30% by weight. The applicant did not seek any relaxation in currently enforceable conditions for its other existing emissions units.

This project is not subject to PSD because the associated emissions increases are not significant for PSD. Total emissions of pollutants from this project will not exceed the approximate annual emission rates in tons per year: PM, 3.80; SO<sub>2</sub>, 12.10; NO<sub>x</sub>, 39.31; CO, 23.88; VOC, 1.56.

Comments were received on the draft of the permit to correct three typographical errors.

I recommend your approval and signature.

December 28, 2001 is day 90 day.

Attachments

/es