Golder Associates Inc.

6241 NW 23rd Street, Suite 500
Gainesville, FL 32653-1500
Telephone (352) 336-5600
Fax (352) 336-6603

August 31, 2001

0137585

Department of Environmental Protection
Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

Attention: Mr. Bill Thomas, Air Administrator

RE: CARGILL CITRO PURE, L.P.
FROSTPROOF CITRUS PLANT
BOILER NO. 2 CONSTRUCTION PERMIT APPLICATION

Dear Mr. Thomas:

Cargill Citro Pure, L.P. is requesting an after-the-fact air construction permit for the modifications performed on Boiler No. 2 during the summer of 2000 at the Frostproof Citrus Plant located in Frostproof, Florida. Enclosed are four (4) copies of the construction permit application.

Thank you for your consideration of this request. Please call if there are any questions.

Sincerely,

GOLDER ASSOCIATES INC.

Sarah Watson

Sarah Watson
Staff Engineer

Enclosures

SLW/nav

cc: G. Ellis, Cargill Citro Pure, L.P.
L. Hadden, Cargill Citro Pure, L.P.
D. Buff

0137585/4/4.1\L083101.doc

Application Routing and Transmittal Sheet

Air Permitting Supervisor - Required Information for Project Setup by Admin

Owner/(Facility Name, if needed): Cargill Citro		Facility ID No.: 1050019
New Facility (Y/N): N	Relocatable (Y/N): N	Project Description:
Project Name: boiler modifications		
Type/Subtype: AC1D	Received: 9/4/01	
Fee Submitted: (✓) correct ( ) incorrect	Should Be $ 0	Overide Reason (if needed):
Fee Checked By: JK Reed	Submitted $ 0	
Date: 9/5/01	Needed/Refund $	

note: after-the-fact

RECEIVED
SEP 13 2001
BUREAU OF AIR REGULATION

Admin - Project Setup Information

Project No.: 007	Initial ARMS Entry (Initials & Date): JK 9/5/01	Vir

Air Permitting Supervisor - Application Information

Application Assigned To: ~~H. GOTSCH~~ E. SVEC*	Date: 9/6/01	
No. of Hardcopies: 4	No. of Disks: —	Confidential Information (Y/N): N
Application Distribution (hardcopy/disk): DEP Engineer: ~~X~~ 3	County: —	Other: 1 ~~DT~~ SWD

*PER TELECON W/C. FANCY 9/7/01 - JK

Air Permitting - Permit Transmittal (add initials & date completed)

Project No.: Permit No.:	Intent/ Draft	Proposed (Title V Only) Stage I	Stage II	Final
Engineer transmits permit to permit supervisor				
Permit supervisor transmits permit to DAPA				
DAPA transmits permit for issuance procedure				
Permit Package Mailed				
ARMS Events Entry				

Normally we compare past actual to future potential emissions & to avoid PSD, these must be less than the PSD significant rate. In this case they assumed past actuals as 0.
- JK

Air Permitting Supervisor - Data Fields for Access System (add a

Owner(if different from above):		
Permit No.:	Issue Date:	
Facility Description:	Source Des	
296:	MACT:	
Fuels:	Control Equipment:	
Comments:		

Air Permitting - System Updates (add initials & date completed)

Engineer - Final Permit Copied (read only) to Air Common\Permits\Permit01\xxxxx :
Engineer (Final Title V Permits only) - Zipped file copied to air common\permits\TV_zip\xxxx:
Engineer - ARMS Summary Screen (Title V draft permits and admin corrections):
Engineer - ARMS Inventory Data Entry:
Permit Secretary - Permit List Data Entry (Access 97):
Permitting Supervisor - copy of permit to compliance section ? Yes or No:

APPLICATION FOR AIR PERMIT
BOILER NO. 2 REPAIRS
CARGILL CITRO PURE, L.P.
FROSTPROOF PLANT

Prepared For:

Cargill Citro Pure, L.P.
P.O. Box 2000
Frostproof, Florida 33842

Prepared By:

Golder Associates Inc.
6241 NW 23rd Street, Suite 500
Gainesville, Florida 32653-1500

August 2001
0137585

DISTRIBUTION:

4 Copies – DEP, Southwest District
2 Copies - Cargill
2 Copies - Golder Associates Inc.

Department of Environmental Protection

Division of Air Resources Management

APPLICATION FOR AIR PERMIT - TITLE V SOURCE

See Instructions for Form No. 62-210.900(1)

I. APPLICATION INFORMATION

Identification of Facility

1. Facility Owner/Company Name: **Cargill Citro-Pure, L.P.**	
2. Site Name: **Frostproof Plant**	
3. Facility Identification Number: **1050019** [ ] Unknown	
4. Facility Location: Street Address or Other Locator: **5th Street and US Alt Highway 27** City: **Frostproof** County: **Polk** Zip Code: **33843**	
5. Relocatable Facility? [ ] Yes [X] No	6. Existing Permitted Facility? [X] Yes [ ] No

Application Contact

1. Name and Title of Application Contact: **Larry Hadden, Environmental Manager**
2. Application Contact Mailing Address: Organization/Firm: **Cargill Citro-Pure, L.P.** Street Address: **P.O. Box 2000** City: **Frostproof** State: **FL** Zip Code: **33843-2000**
3. Application Contact Telephone Numbers: Telephone: **(863) 635 - 8057** Fax: **(863) 635 - 8140**

Application Processing Information (DEP Use)

1. Date of Receipt of Application:	9-4-01
2. Permit Number:	1050019-007-AC
3. PSD Number (if applicable):	
4. Siting Number (if applicable):	

Purpose of Application

Air Operation Permit Application

This Application for Air Permit is submitted to obtain: (Check one)

[ ] Initial Title V air operation permit for an existing facility which is classified as a Title V source.

[ ] Initial Title V air operation permit for a facility which, upon start up of one or more newly constructed or modified emissions units addressed in this application, would become classified as a Title V source.

Current construction permit number:_____

[ ] Title V air operation permit revision to address one or more newly constructed or modified emissions units addressed in this application.

Current construction permit number:_____

Operation permit number to be revised:_____

[ ] Title V air operation permit revision or administrative correction to address one or more proposed new or modified emissions units and to be processed concurrently with the air construction permit application. (Also check Air Construction Permit Application below.)

Operation permit number to be revised/corrected:_____

[ ] Title V air operation permit revision for reasons other than construction or modification of an emissions unit. Give reason for the revision; e.g., to comply with a new applicable requirement or to request approval of an "Early Reductions" proposal.

Operation permit number to be revised:_____

Reason for revision:_____

Air Construction Permit Application

This Application for Air Permit is submitted to obtain: (Check one)

[**X**] Air construction permit to construct or modify one or more emissions units.

[ ] Air construction permit to make federally enforceable an assumed restriction on the potential emissions of one or more existing, permitted emissions units.

[ ] Air construction permit for one or more existing, but unpermitted, emissions units.

Owner/Authorized Representative or Responsible Official

1. Name and Title of Owner/Authorized Representative or Responsible Official:
   Bryce Kelly, General Operations Manager
2. Owner/Authorized Representative or Responsible Official Mailing Address:
   Organization/Firm: **Cargill Citro Pure, L.P.**
   Street Address: **100 East 6th Street**
   City: **Frostproof** State: **FL** Zip Code: **33843**
3. Owner/Authorized Representative or Responsible Official Telephone Numbers:
   Telephone: **(863) 635 - 8142** Fax: **(863) 635 - 8040**
4. Owner/Authorized Representative or Responsible Official Statement:

   I, the undersigned, am the owner or authorized representative(check here [ ], if so) or the responsible official (check here [ ], if so) of the Title V source addressed in this application, whichever is applicable. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof. I understand that a permit, if granted by the Department, cannot be transferred without authorization from the Department, and I will promptly notify the Department upon sale or legal transfer of any permitted emissions unit.*

Bryce Kelly — Signature

8/30/01 — Date

* Attach letter of authorization if not currently on file.

Professional Engineer Certification

1. Professional Engineer Name: **David A. Buff**
   Registration Number: **19011**
2. Professional Engineer Mailing Address:
   Organization/Firm: **Golder Associates Inc.**
   Street Address: **6241 NW 23rd Street, Suite 500**
   City: **Gainesville** State: **FL** Zip Code: **32653-1500**
3. Professional Engineer Telephone Numbers:
   Telephone: **(352) 336 - 5600** Fax: **(352) 336 - 6603**

4. Professional Engineer Statement:

I, the undersigned, hereby certify, except as particularly noted herein, that:*

(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this Application for Air Permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and

(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.

If the purpose of this application is to obtain a Title V source air operation permit (check here [ ], if so), I further certify that each emissions unit described in this Application for Air Permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance schedule is submitted with this application.

If the purpose of this application is to obtain an air construction permit for one or more proposed new or modified emissions units (check here [X], if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.

If the purpose of this application is to obtain an initial air operation permit or operation permit revision for one or more newly constructed or modified emissions units (check here [ ], if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.

David A. Buff
Signature

8/30/01
Date

(seal)

* Attach any exception to certification statement.

Scope of Application

Emissions Unit ID	Description of Emissions Unit	Permit Type	Processing Fee
005	Boiler No. 2	AC1D	NA

Application Processing Fee

Check one: [ ] Attached - Amount: $: _____ [X] Not Applicable

Construction/Modification Information

1. Description of Proposed Project or Alterations:

   The purpose of this application is to address repairs performed on Boiler No. 2 by providing an after-the-fact construction permit application. A limit on annual fuel oil usage is proposed to avoid PSD review.

2. Projected or Actual Date of Commencement of Construction: **01-JUL-2000**

3. Projected Date of Completion of Construction: **31-DEC-2001**

Application Comment

II. FACILITY INFORMATION

A. GENERAL FACILITY INFORMATION

Facility Location and Type

1. Facility UTM Coordinates: Zone: **17** East (km): **448.0** North (km): **3068.5**			
2. Facility Latitude/Longitude: Latitude (DD/MM/SS): **27 / 44 / 22** Longitude (DD/MM/SS): **81 / 31 / 58**			
3. Governmental Facility Code: **0**	4. Facility Status Code: **A**	5. Facility Major Group SIC Code: **20**	6. Facility SIC(s): **2037**
7. Facility Comment (limit to 500 characters):			

Facility Contact

1. Name and Title of Facility Contact: **Larry Hadden, Environmental Manager**			
2. Facility Contact Mailing Address: Organization/Firm: **Cargill Citro Pure, L.P.** Street Address: **P.O. Box 2000** City: **Frostproof** State: **FL** Zip Code: **33843-2000**			
3. Facility Contact Telephone Numbers: Telephone: **(863) 635 - 8057** Fax: **(863) 635 - 8140**			

Facility Regulatory Classifications

Check all that apply:

1. [ ] Small Business Stationary Source?	[ ] Unknown
2. [X] Major Source of Pollutants Other than Hazardous Air Pollutants (HAPs)?	
3. [ ] Synthetic Minor Source of Pollutants Other than HAPs?	
4. [X] Major Source of Hazardous Air Pollutants (HAPs)?	
5. [ ] Synthetic Minor Source of HAPs?	
6. [ ] One or More Emissions Units Subject to NSPS?	
7. [ ] One or More Emission Units Subject to NESHAP?	
8. [ ] Title V Source by EPA Designation?	
9. Facility Regulatory Classifications Comment (limit to 200 characters):	

List of Applicable Regulations

See Attached Title V Core List Effective 03/25/97, except for 40 CFR 82.	
All Federal regulatory citations reflect the rule language as of July 2001.	
All State regulatory citations reflect the rule language as of July 2001.	
Only these rules, regulations, and ordinances specifically identified herein apply to this facility.	

Title V Core List Effective:03/25/97

[**Note:** The Title V Core List is intended to simplify the completion of the "List of Applicable Regulations" that apply facility-wide (see Subsection II.B. of DEP Form No. 62-210.900(1), Application for Air Permit - Long Form. The Title V Core List is a list of rules to which all Title V Sources are presumptively subject. The Title V Core List may be referenced in its entirety, or with specific exceptions. The Department may periodically update the Title V Core List.

Requirements that apply to emissions units must be identified in Subsection III.B. of DEP Form No. 62-210.900(1), Application for Air Permit - Long Form.

Applicants must identify all "applicable requirements" in order to claim the "permit shield" described at Rule 62-213.460, F.A.C.]

Federal: ***(description)***

40 CFR 61: National Emission Standards for Hazardous Air Pollutants (NESHAP)
40 CFR 61: Subpart M: NESHAP for Asbestos.
~~40 CFR 82: Protection of Stratospheric Ozone.~~
~~40 CFR 82: Subpart B: Servicing of Motor Vehicle Air Conditioners (MVAC).~~
~~40 CFR 82: Subpart F: Recycling and Emissions Reduction.~~

State: ***(description)***

CHAPTER 62-4, F.A.C.: PERMITS, effective 10-16-95

62-4.030, F.A.C.: General Prohibition.
62-4.040, F.A.C.: Exemptions.
62-4.050, F.A.C.: Procedure to Obtain Permits; Application
62-4.060, F.A.C.: Consultation.
62-4.070, F.A.C.: Standards for Issuing or Denying Permits; Issuance; Denial.
62-4.080, F.A.C.: Modification of Permit Conditions.
62-4.090, F.A.C.: Renewals.
62-4.100, F.A.C.: Suspension and Revocation.
62-4.110, F.A.C.: Financial Responsibility.
62-4.120, F.A.C.: Transfer of Permits.
62-4.130, F.A.C.: Plant Operation - Problems.
62-4.150, F.A.C.: Review
62-4.160, F.A.C.: Permit Conditions.
62-4.210, F.A.C.: Construction Permits.
62-4.220, F.A.C.: Operation Permit for New Sources.

CHAPTER 62-103, F.A.C.: RULES OF ADMINISTRATIVE PROCEDURE, effective 12-31-95

62-103.150, F.A.C.: Public Notice of Application and Proposed Agency Action.
62-103.155, F.A.C.: Petition for Administrative Hearing; Waiver of Right to Administrative Proceeding

Title V Core List

Effective:03/25/97

CHAPTER 62-210, F.A.C.: STATIONARY SOURCES - GENERAL REQUIREMENTS, effective 03-21-96

62-210.300, F.A.C.: Permits Required.
62-210.300(1), F.A.C.: Air Construction Permits.
62-210.300(2), F.A.C.: Air Operation Permits.
62-210.300(3), F.A.C.: Exemptions.
62-210.300(3)(a), F.A.C.: Full Exemptions.
62-210.300(3)(b), F.A.C.: Temporary Exemption.

62-210.300(5), F.A.C.: Notification of Startup.
62-210.300(6), F.A.C.: Emissions Unit Reclassification.

62-210.350, F.A.C.: Public Notice and Comment.
62-210.350(3), F.A.C.: Additional Public Notice Requirements for Sources Subject to Operation Permits for Title V Sources.

62-210.360, F.A.C.: Administrative Permit Corrections.

62-210.370(3), F.A.C.: Annual Operating Report for Air Pollutant Emitting Facility.

62-210.650, F.A.C.: Circumvention.

62-210.900, F.A.C.: Forms and Instructions.
62-210.900(1) Application for Air Permit - Long Form, Form and Instructions.
62-210.900(5) Annual Operating Report for Air Pollutant Emitting Facility, Form and Instructions.

CHAPTER 62-213, F.A.C.: OPERATION PERMITS FOR MAJOR SOURCES OF AIR POLLUTION, effective 03-20-96

62-213.205, F.A.C.: Annual Emissions Fee.
62-213.400, F.A.C.: Permits and Permit Revisions Required.
62-213.410, F.A.C.: Changes Without Permit Revision.
62-213.412, F.A.C.: Immediate Implementation Pending Revision Process.
62-213.420, F.A.C.: Permit Applications.
62-213.430, F.A.C.: Permit Issuance, Renewal, and Revision.
62-213.440, F.A.C.: Permit Content.
62-213.460, F.A.C.: Permit Shield.

62-213.900, F.A.C.: Forms and Instructions.
62-213.900(1) Major Air Pollution Source Annual Emissions Fee Form, Form and Instructions.

CHAPTER 62-256, F.A.C.: OPEN BURNING AND FROST PROTECTION FIRES, effective 11-30-94

CHAPTER 62-257, F.A.C: ASBESTOS NOTIFICATION AND FEE, effective 03/24/96

CHAPTER 62-281, F.A.C: MOTOR VEHICLE AIR CONDITIONING REFRIGERANT RECOVERY AND RECYCLING, effective 03-07-96

CHAPTER 62-296, F.A.C.: STATIONARY SOURCES - EMISSION STANDARDS, effective 03-13-96

62-296.320(2), F.A.C.: Objectionable Odor Prohibited.
62-296.320(3), F.A.C.: Industrial, Commercial, and Municipal Open Burning Prohibited
62-296.320(4)(c), F.A.C.: Unconfined Emissions of Particulate Matter

B. FACILITY POLLUTANTS

List of Pollutants Emitted

1. Pollutant Emitted	2. Pollutant Classif.	3. Requested Emissions Cap lb/hour	tons/year	4. Basis for Emissions Cap	5. Pollutant Comment
PM	A				Particulate Matter-Total
PM_{10}	A				Particulate Matter-PM_{10}
SO_2	A				Sulfur Dioxide
NO_X	A				Nitrogen Oxides
CO	A				Carbon Monoxides
VOC	A				Volatile Organic Compounds
H115	A				Methanol

C. FACILITY SUPPLEMENTAL INFORMATION

Supplemental Requirements

1. Area Map Showing Facility Location: [X] Attached, Document ID: CC-FI-C1 [ ] Not Applicable [ ] Waiver Requested
2. Facility Plot Plan: [X] Attached, Document ID: CC-FI-C2 [ ] Not Applicable [ ] Waiver Requested
3. Process Flow Diagram(s): [X] Attached, Document ID: CC-FI-C3 [ ] Not Applicable [ ] Waiver Requested
4. Precautions to Prevent Emissions of Unconfined Particulate Matter: [ ] Attached, Document ID: _____ [X] Not Applicable [ ] Waiver Requested
5. Fugitive Emissions Identification: [ ] Attached, Document ID: _____ [X] Not Applicable [ ] Waiver Requested
6. Supplemental Information for Construction Permit Application: [X] Attached, Document ID: Attachment A [ ] Not Applicable
7. Supplemental Requirements Comment:

Additional Supplemental Requirements for Title V Air Operation Permit Applications

8. List of Proposed Insignificant Activities:
   [ ] Attached, Document ID:_____ [ ] Not Applicable

9. List of Equipment/Activities Regulated under Title VI:
   [ ] Attached, Document ID:_____
   [ ] Equipment/Activities On site but Not Required to be Individually Listed
   [ ] Not Applicable

10. Alternative Methods of Operation:
    [ ] Attached, Document ID:_____ [ ] Not Applicable

11. Alternative Modes of Operation (Emissions Trading):
    [ ] Attached, Document ID:_____ [ ] Not Applicable

12. Identification of Additional Applicable Requirements:
    [ ] Attached, Document ID:_____ [ ] Not Applicable

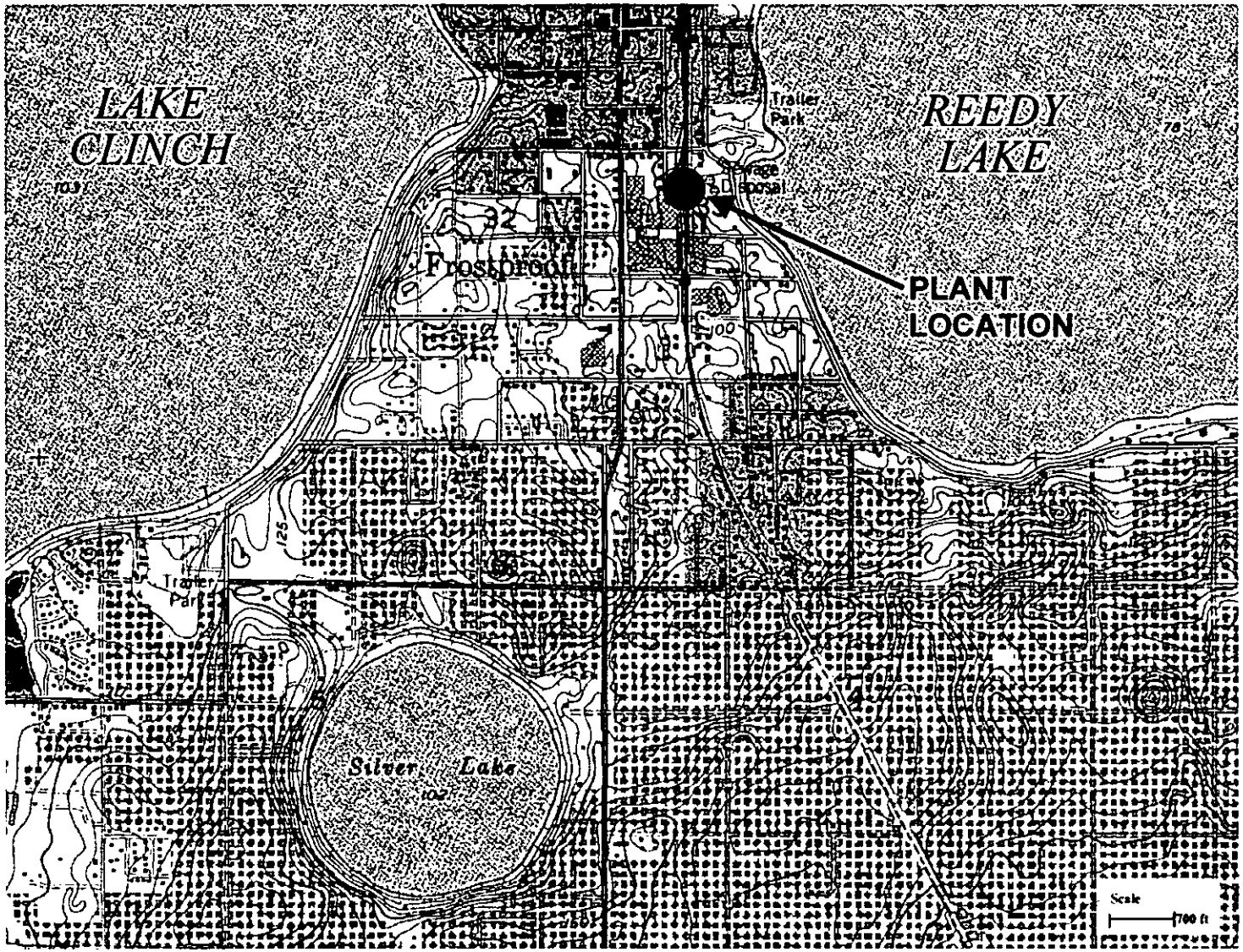
13. Risk Management Plan Verification:
    [ ] Plan previously submitted to Chemical Emergency Preparedness and Prevention Office (CEPPO). Verification of submittal attached (Document ID:_____) or previously submitted to DEP (Date and DEP Office:_____)
    [ ] Plan to be submitted to CEPPO (Date required:_____)
    [ ] Not Applicable

14. Compliance Report and Plan:
    [ ] Attached, Document ID:_____ [ ] Not Applicable

15. Compliance Certification (Hard-copy Required):
    [ ] Attached, Document ID:_____ [ ] Not Applicable

ATTACHMENT CC-FI-C1

AREA MAP



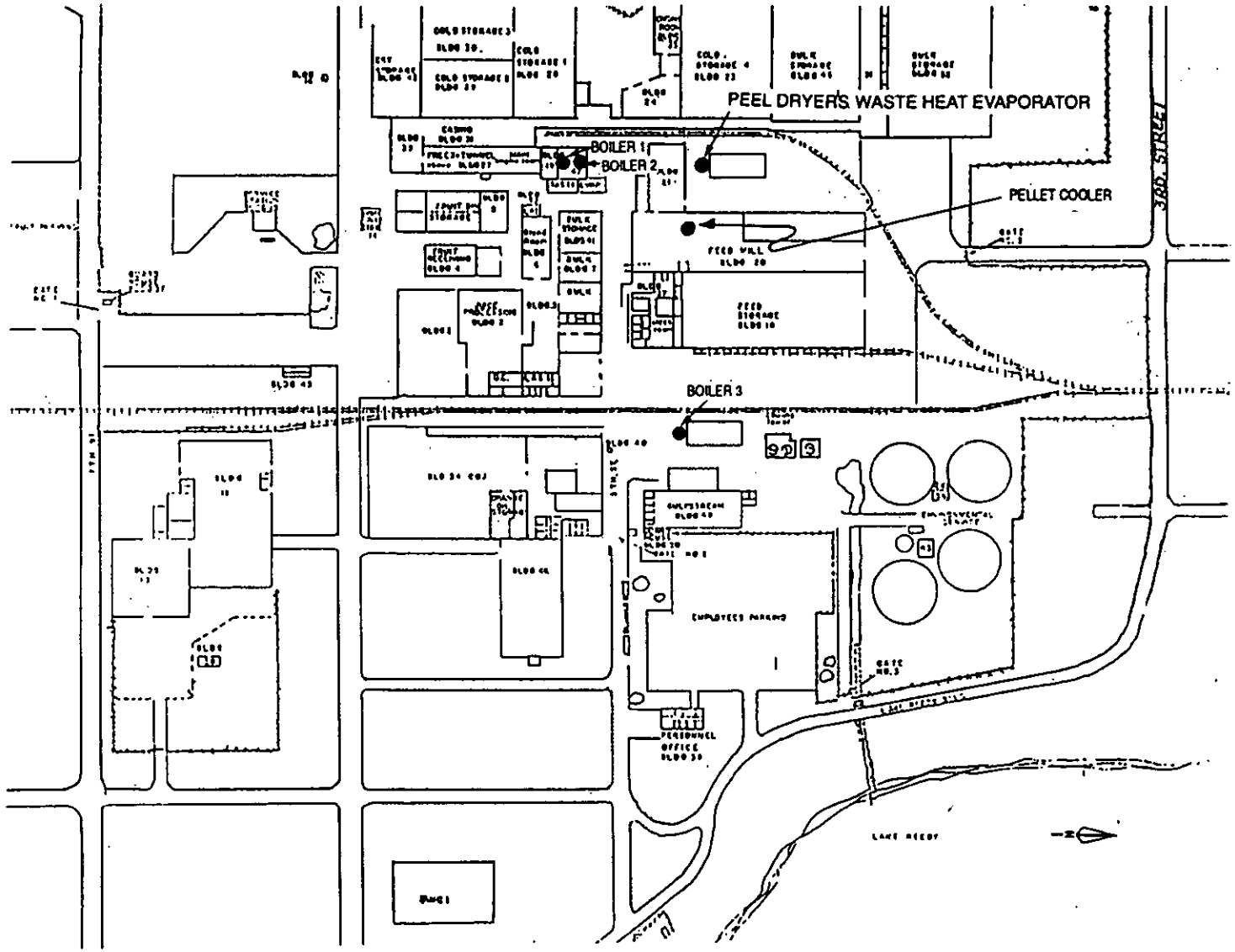
Attachment CC-FI-C1
Location of the Cargill Citro Pure, L.P. - Frostproof Facility

Source: 3-D TopoQuads, 1999; Golder, 2001.

Golder Associates

ATTACHMENT CC-FI-C2

FACILITY PLOT PLAN

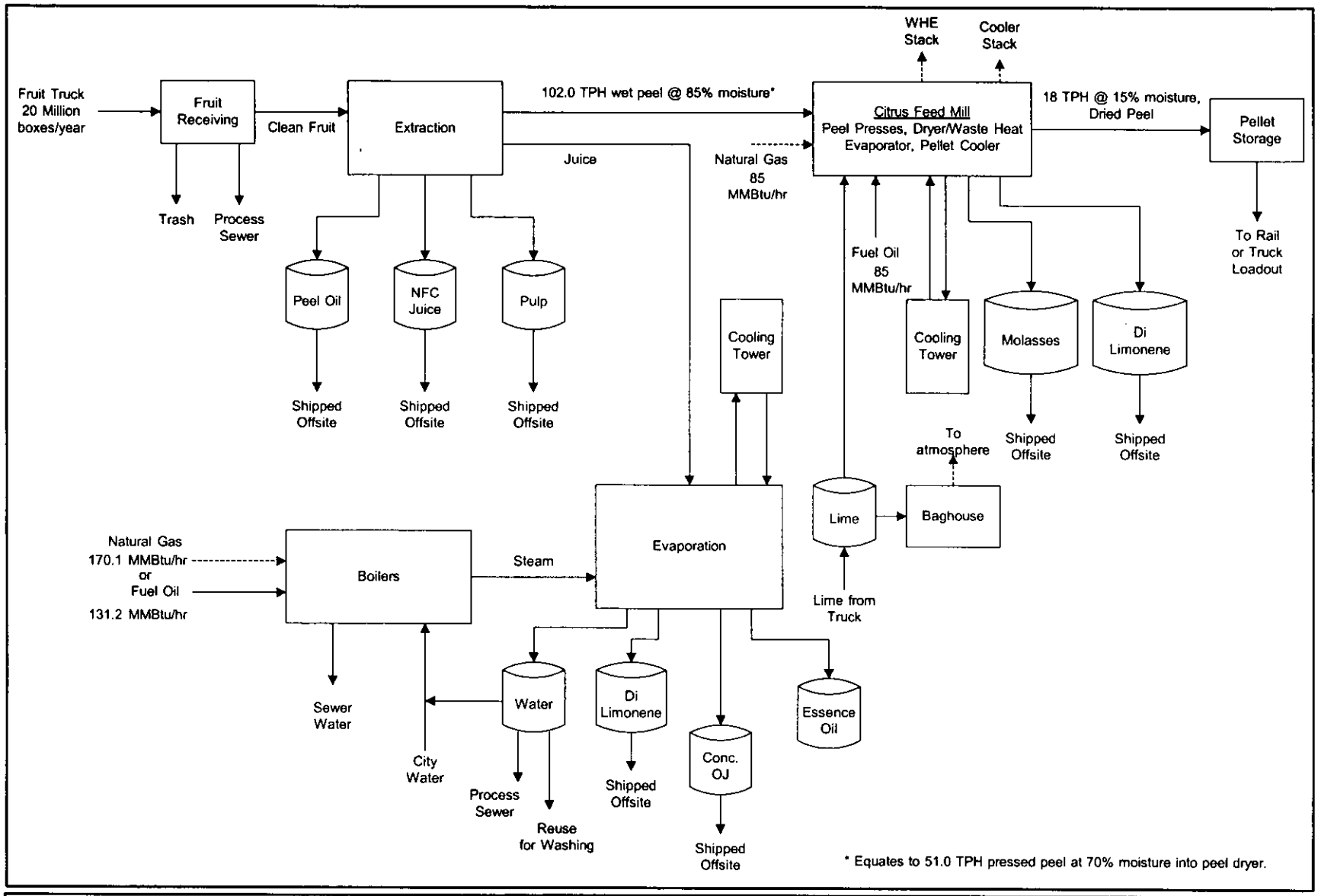


Attachment CC-FI-C2
Stack Locations for Sources at the Cargill Citro Pure, L.P. - Frostproof Facility

Golder Associates

ATTACHMENT CC-FI-C3

PROCESS FLOW DIAGRAM



Attachment CC-F1-C3
Cargill Citro Pure, L.P.
Process Flow Diagram
Frostproof, Florida

Process Flow Legend
Solid/Liquid ——→
Gas ----------→
Steam —·—·—→

Emission Unit: Facility

Filename: 0137585\4\4.4\4.4.1\FLOW.VSD

Date: 8/30/01

Golder Associates

III. EMISSIONS UNIT INFORMATION

A separate Emissions Unit Information Section (including subsections A through J as required) must be completed for each emissions unit addressed in this Application for Air Permit. If submitting the application form in hard copy, indicate, in the space provided at the top of each page, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application.

A. GENERAL EMISSIONS UNIT INFORMATION
(All Emissions Units)

Emissions Unit Description and Status

1. Type of Emissions Unit Addressed in This Section: (Check one)

[X] This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).

[ ] This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.

[ ] This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.

2. Regulated or Unregulated Emissions Unit? (Check one)

[X] The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.

[ ] The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.

3. Description of Emissions Unit Addressed in This Section (limit to 60 characters):
Boiler No. 2

4. Emissions Unit Identification Number:
ID: **005**
[ ] No ID
[ ] ID Unknown

5. Emissions Unit Status Code:	6. Initial Startup Date:	7. Emissions Unit Major Group SIC Code:	8. Acid Rain Unit?
A		**20**	[ ]

9. Emissions Unit Comment: (Limit to 500 Characters)

E. Keeler Company Process Steam Boiler (64.9 MMBtu/hr)

Emissions Unit Control Equipment

1. Control Equipment/Method Description (Limit to 200 characters per device or method):
2. Control Device or Method Code(s):

Emissions Unit Details

1. Package Unit: Manufacturer:	Model Number:	
2. Generator Nameplate Rating:	MW	
3. Incinerator Information:		
Dwell Temperature:		°F
Dwell Time:		seconds
Incinerator Afterburner Temperature:		°F

B. EMISSIONS UNIT CAPACITY INFORMATION
(Regulated Emissions Units Only)

Emissions Unit Operating Capacity and Schedule

1. Maximum Heat Input Rate:		**64.9**	mmBtu/hr
2. Maximum Incineration Rate:	lb/hr		tons/day
3. Maximum Process or Throughput Rate:			
4. Maximum Production Rate:			
5. Requested Maximum Operating Schedule:			
	24 hours/day	**7**	days/week
	52 weeks/year	**8,760**	hours/year
6. Operating Capacity/Schedule Comment (limit to 200 characters):			

C. EMISSIONS UNIT REGULATIONS
(Regulated Emissions Units Only)

List of Applicable Regulations

62-296.406 – F.A.C. Steam Generators < 250 MMBtu/hr
62-297.310 – F.A.C. General Compliance Test Requirements
62-297.401(9)(a) – F.A.C. EPA Test Method 9

D. EMISSION POINT (STACK/VENT) INFORMATION
(Regulated Emissions Units Only)

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram? **Boiler No. 2**	2. Emission Point Type Code: **1**	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point):		
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common:		
5. Discharge Type Code: **V**	6. Stack Height: **62** feet	7. Exit Diameter: **3.5** feet
8. Exit Temperature: **365** °F	9. Actual Volumetric Flow Rate: **18,365** acfm	10. Water Vapor: %
11. Maximum Dry Standard Flow Rate: dscfm	12. Nonstack Emission Point Height: feet	
13. Emission Point UTM Coordinates: Zone:	East (km):	North (km):
14. Emission Point Comment (limit to 200 characters):		

E. SEGMENT (PROCESS/FUEL) INFORMATION
(All Emissions Units)

Segment Description and Rate: Segment 1 of 2

1. Segment Description (Process/Fuel Type) (limit to 500 characters): **External Combustion boilers, industrial, distillate oil, 10-100 MMBtu/hr.**		
2. Source Classification Code (SCC): **1-03-005-02**	3. SCC Units: **Thousand Gallons burned**	
4. Maximum Hourly Rate: **0.4772**	5. Maximum Annual Rate: **3,400**	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur: **0.05**	8. Maximum % Ash:	9. Million Btu per SCC Unit: **136**
10. Segment Comment (limit to 200 characters): **Max hourly rate represents proposed permitted max for Boiler No. 2 on a monthly average basis.**		

Segment Description and Rate: Segment 2 of 2

1. Segment Description (Process/Fuel Type) (limit to 500 characters): **External Combustion boilers, industrial, natural gas, 10-100 MMBtu/hr**		
2. Source Classification Code (SCC): **1-02-006-02**	3. SCC Units: **Million Cubic Feet Burned**	
4. Maximum Hourly Rate: **0.0649**	5. Maximum Annual Rate: **568.5**	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit: **1,000**
10. Segment Comment (limit to 200 characters):		

F. EMISSIONS UNIT POLLUTANTS
(All Emissions Units)

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
PM			NS
PM_{10}			NS
SO_2			EL
NO_X			NS
CO			NS
VOC			NS

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units - Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: **PM**	2. Total Percent Efficiency of Control:
3. Potential Emissions: **0.95** lb/hour **3.80** tons/year	4. Synthetically Limited? [X]
5. Range of Estimated Fugitive Emissions: [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year	
6. Emission Factor: **2 lb/1000 gal** Reference: **AP-42**	7. Emissions Method Code: **3**
8. Calculation of Emissions (limit to 600 characters): **See Attachment CC-EU1-G8**	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): **Based on proposed maximum No. 2 fuel oil usage.**	

Allowable Emissions Allowable Emissions _____ of _____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units:	4. Equivalent Allowable Emissions: b/hour tons/year
5. Method of Compliance (limit to 60 characters):	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):	

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units - Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: **PM_{10}**	2. Total Percent Efficiency of Control:
3. Potential Emissions: **0.49** lb/hour **2.16** tons/year	4. Synthetically Limited? [X]
5. Range of Estimated Fugitive Emissions: [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year	
6. Emission Factor: **7.6 lb/MMscf** Reference: **AP-42**	7. Emissions Method Code: **3**
8. Calculation of Emissions (limit to 600 characters): **See Attachment CC-EU1-G8**	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): **Hourly rate based on permitted maximum natural gas usage. Annual emission rate based on 8,760 hr/yr.**	

Allowable Emissions Allowable Emissions _____ of _____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance (limit to 60 characters):	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):	

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units - Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: **SO_2**	2. Total Percent Efficiency of Control:
3. Potential Emissions: **3.39** lb/hour **12.10** tons/year	4. Synthetically Limited? [X]
5. Range of Estimated Fugitive Emissions: [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year	
6. Emission Factor: **142 S** Reference: **AP-42**	7. Emissions Method Code: **3**
8. Calculation of Emissions (limit to 600 characters): **See Attachment CC-EU1-G8**	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): **Hourly and annual emission rate based on proposed maximum for No. 2 fuel oil usage.**	

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: **OTHER**	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: **0.05 % Sulfur**	4. Equivalent Allowable Emissions: **3.39** lb/hour **12.10** tons/year
5. Method of Compliance (limit to 60 characters): **Fuel analysis by vendor or oil sample data.**	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): **Rule 62-296.406(3) F.A.C. and BACT.**	

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units - Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: **NO_x**	2. Total Percent Efficiency of Control:

3. Potential Emissions: **9.54** lb/hour **39.31** tons/year	4. Synthetically Limited? [X]
5. Range of Estimated Fugitive Emissions: [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year	
6. Emission Factor: **20 lb/1000 gal** Reference: **AP-42**	7. Emissions Method Code: **3**

8. Calculation of Emissions (limit to 600 characters):

See Attachment CC-EU1-G8

9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):

Hourly and annual emission rate based on proposed maximum for No. 2 fuel oil usage.

Allowable Emissions Allowable Emissions _____ of _____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year

5. Method of Compliance (limit to 60 characters):

6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: **CO**	2. Total Percent Efficiency of Control:
3. Potential Emissions: **5.45** lb/hour **23.88** tons/year	4. Synthetically Limited? [X]
5. Range of Estimated Fugitive Emissions: [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year	
6. Emission Factor: **84 lb/MMscf** Reference: **AP-42**	7. Emissions Method Code: **3**
8. Calculation of Emissions (limit to 600 characters): **See Attachment CC-EU1-G8**	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): **Hourly emission rate based on maximum for natural gas usage. Annual emission rate based on 8,760 hr/yr.**	

Allowable Emissions Allowable Emissions _____ of _____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance (limit to 60 characters):	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):	

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units - Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: **VOC**	2. Total Percent Efficiency of Control:
3. Potential Emissions: **0.36** lb/hour **1.6** tons/year	4. Synthetically Limited? [X]
5. Range of Estimated Fugitive Emissions: [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year	
6. Emission Factor: **5.5 lb/MMscf** Reference: **AP-42**	7. Emissions Method Code: **3**
8. Calculation of Emissions (limit to 600 characters): **See Attachment CC-EU1-G8**	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): **Hourly emission rate based on maximum for natural gas usage. Annual emission rate based on 8,760 hr/yr.**	

Allowable Emissions Allowable Emissions _____ of _____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance (limit to 60 characters):	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):	

H. VISIBLE EMISSIONS INFORMATION
(Only Regulated Emissions Units Subject to a VE Limitation)

Visible Emissions Limitation: Visible Emissions Limitation 1 of 1

1. Visible Emissions Subtype: **VE20**	2. Basis for Allowable Opacity: [X] Rule [ ] Other
3. Requested Allowable Opacity: Normal Conditions: **20** % Exceptional Conditions: **40** % Maximum Period of Excess Opacity Allowed: **2** min/hour	
4. Method of Compliance: **EPA Method 9**	
5. Visible Emissions Comment (limit to 200 characters): **Rule 62-296.406(1), F.A.C.**	

I. CONTINUOUS MONITOR INFORMATION
(Only Regulated Emissions Units Subject to Continuous Monitoring)

Continuous Monitoring System: Continuous Monitor _____ of _____

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	[ ] Rule [ ] Other
4. Monitor Information: Manufacturer: Model Number:	Serial Number:
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment (limit to 200 characters):	

J. EMISSIONS UNIT SUPPLEMENTAL INFORMATION
(Regulated Emissions Units Only)

Supplemental Requirements

1. Process Flow Diagram [X] Attached, Document ID: CC-EU1-J1 [ ] Not Applicable [ ] Waiver Requested
2. Fuel Analysis or Specification [X] Attached, Document ID: CC-EU1-J2 [ ] Not Applicable [ ] Waiver Requested
3. Detailed Description of Control Equipment [ ] Attached, Document ID: _____ [X] Not Applicable [ ] Waiver Requested
4. Description of Stack Sampling Facilities [ ] Attached, Document ID: _____ [X] Not Applicable [ ] Waiver Requested
5. Compliance Test Report [ ] Attached, Document ID: _____ [ ] Previously submitted, Date: _____ [X] Not Applicable
6. Procedures for Startup and Shutdown [ ] Attached, Document ID: _____ [X] Not Applicable [ ] Waiver Requested
7. Operation and Maintenance Plan [ ] Attached, Document ID: _____ [X] Not Applicable [ ] Waiver Requested
8. Supplemental Information for Construction Permit Application [X] Attached, Document ID: Attachment A [ ] Not Applicable
9. Other Information Required by Rule or Statute [ ] Attached, Document ID: _____ [X] Not Applicable
10. Supplemental Requirements Comment:

Additional Supplemental Requirements for Title V Air Operation Permit Applications

11. Alternative Methods of Operation
[ ] Attached, Document ID:_____ [X] Not Applicable

12. Alternative Modes of Operation (Emissions Trading)
[ ] Attached, Document ID:_____ [X] Not Applicable

13. Identification of Additional Applicable Requirements
[ ] Attached, Document ID:_____ [X] Not Applicable

14. Compliance Assurance Monitoring Plan
[ ] Attached, Document ID:_____ [X] Not Applicable

15. Acid Rain Part Application (Hard-copy Required)

[ ] Acid Rain Part - Phase II (Form No. 62-210.900(1)(a))
Attached, Document ID:_____

[ ] Repowering Extension Plan (Form No. 62-210.900(1)(a)1.)
Attached, Document ID:_____

[ ] New Unit Exemption (Form No. 62-210.900(1)(a)2.)
Attached, Document ID:_____

[ ] Retired Unit Exemption (Form No. 62-210.900(1)(a)3.)
Attached, Document ID:_____

[ ] Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.)
Attached, Document ID:_____

[ ] Phase NOx Averaging Plan (Form No. 62-210.900(1)(a)5.)
Attached, Document ID:_____

[X] Not Applicable

ATTACHMENT CC-EU1-G8

FUTURE POTENTIAL EMISSIONS DATA

Attachment CC-EU1-G8. Potential Emissions for Boiler No. 2, CCP Frostproof

Parameter	Units	No. 2 Fuel Oil	Natural Gas
Operating Data			
Annual Operating Hours	hr/yr	7,125	8,760
Maximum Heat Input Rate	10^6 Btu/hr	64.9	64.9
Hourly Fuel Oil Usage[a]	10^3 gal/hr	0.477	N/A
Annual Fuel Oil Usage	10^3 gal/yr	3,400	N/A
Maximum Sulfur Content	Weight %	0.05	N/A
Hourly Natural Gas Usage[b]	10^6 scf/hr	N/A	0.0649
Annual Natural Gas Usage	10^6 scf/yr	N/A	568.5

Pollutant	AP-42 Emissions Factor[c]	No. 2 Fuel Oil Hourly Emisson Rate (lb/hr)	No. 2 Fuel Oil Annual Emission Rate (TPY)	Natural Gas Hourly Emisson Rate (lb/hr)	Natural Gas Annual Emission Rate (TPY)	Maximum Total Emission Rate Hourly Emisson Rate (lb/hr)	Maximum Total Emission Rate Annual Emission Rate (TPY)
Particulate Matter							
Fuel oil	2 lb/10^3 gal	0.95	3.40	--	--	--	--
Natural gas	7.6 lb/10^6 ft^3	--	--	0.49	2.16	--	--
Worse-Case Combination of Fuels		--	--	--	--	0.95	3.80
Particulate Matter (PM_{10})							
Fuel oil	1 lb/10^3 gal	0.48	1.70	--	--	--	--
Natural gas	7.6 lb/10^6 ft^3	--	--	0.49	2.16	--	--
Worse-Case Combination of Fuels		--	--	--	--	0.49	2.16
Sulfur Dioxide							
Fuel oil	142 *(S)lb/10^3 g	3.39	12.07	--	--	--	--
Natural gas	0.6 lb/10^6 ft^3	--	--	0.04	0.17	--	--
Worse-Case Combination of Fuels		--	--	--	--	3.39	12.10
Nitrogen Oxides							
Fuel oil	20 lb/10^3 gal	9.54	34.00	--	--	--	--
Natural gas	100 lb/10^6 ft^3	--	--	6.49	28.43	--	--
Worse-Case Combination of Fuels		--	--	--	--	9.54	39.31
Carbon Monoxide							
Fuel oil	5 lb/10^3 gal	2.39	8.50	--	--	--	--
Natural gas	84 lb/10^6 ft^3	--	--	5.45	23.88	--	--
Worse-Case Combination of Fuels		--	--	--	--	5.45	23.88
Volatile Organic Compounds							
Fuel oil	0.2 lb/10^3 gal	0.10	0.34	--	--	--	--
Natural gas	5.5 lb/10^6 ft^3[e]	--	--	0.36	1.56	--	--
Worse-Case Combination of Fuels		--	--	--	--	0.36	1.56

Footnotes:

[a] Based on the heat content of fuel oil of 136,000 Btu/gallon.

[b] Based on the heat content of natural gas of 1,000 Btu/scf.

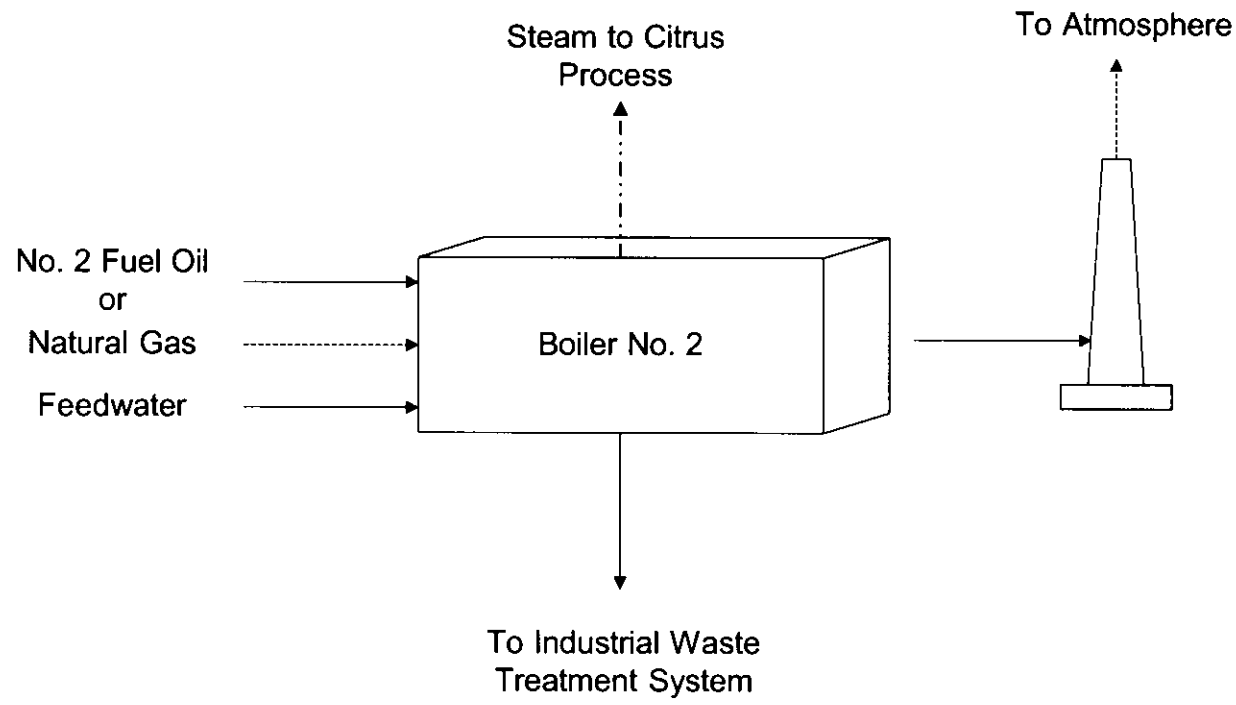
[c] Emission factors for fuel oil are based on AP-42, Section 1.3, September 1998. Emission factors for natural gas are based on AP-42, Section 1.4, July 1998.

[d] S denotes the weight-percent of Sulfur in fuel oil; Maximum sulfur content = 0.05%.

[e] Based on methane comprised of 52% total VOC.

ATTACHMENT CC-EU1-J1

PROCESS FLOW DIAGRAM



Attachment CC-EU1-J1
Cargill Citro Pure, L.P.
Process Flow Diagram
Frostproof, Florida

Process Flow Legend
Solid/Liquid
Gas
Steam

Emission Unit: Boiler No. 2

Filename: 0137585\4\4.4\4.4.1\FLOW.VSD

Date: 8/30/01

Golder Associates

ATTACHMENT CC-EU1-J2

FUEL ANALYSIS OR SPECIFICATION

ATTACHMENT CC-EU1-J2
FUEL ANALYSIS OR SPECIFICATION

Fuel Analysis Specification for Cargill Citro Pure, L.P., Boiler No. 2

Parameter	No. 2 Fuel Oil	Natural Gas
Density (lb/gal)	6.8	NA
Heating Value (Btu/gal) or (Btu/scf)	136,000	1,000
Nitrogen (%)	0.01	NA
Sulfur (%)	0.05 Max	NA
Ash/Inorganic (%)	< 0.05	NA

ATTACHMENT A

SUPPLEMENTAL INFORMATION FOR CONSTRUCTION PERMIT APPLICATION

LIST OF TABLES

LIST OF APPENDICES

1.0 INTRODUCTION

Cargill Citro Pure, L. P. (CCP) owns and operates a citrus processing plant located in Frostproof, Polk County, Florida. As part of the operations, three steam boilers are operated, Boiler Nos. 1, 2 and 3. During the summer of 2000, CCP performed certain repairs on Boiler No. 2. The repairs included dismantling of the existing steam tubes, installation of new steam tubes, and replacement of the combustion chamber refractory and casing. Combustion chamber insulation that was removed to gain access to the existing steam tubes was also replaced. Historically, such activity would be categorized as routine repair and replacement. However, the U.S. Environmental Protection Agency (EPA) has recently issued several determinations addressing the definition and the criteria used in determining routine replacement and repair.

In March 2001, on behalf of CCP, Golder Associates submitted a letter to the Southwest District of the Florida Department of Environmental Protection (FDEP) describing the repairs made to Boiler No. 2 (refer to Appendix A for copy of letter). This letter also included descriptions of why the changes did not subject the boiler to New Source Performance Standards (NSPS) or the new source review-prevention of significant deterioration (PSD) rules. On April 27th, FDEP issued a permit determination notifying CCP that the repairs to Boiler No. 2 constituted a modification since it was not routine maintenance and there is a potential for increase in emissions that could exceed PSD significant thresholds. A copy of this permit determination can be found in Appendix B.

As per the permit determination, CCP is now applying for an after-the-fact construction permit for Boiler No. 2 and is requesting a limit on the fuel oil usage and sulfur content to avoid PSD review.

2.0 PROJECT DESCRIPTION

Boiler No. 2 is an E. Keeler Company steam boiler manufactured in 1975. The boiler is currently operating under the Final Title V Permit No. 1050019-003-AV issued June 6, 2000. A copy of the subsection of the Title V permit relevant to Boiler No. 2 is presented in Appendix C. The annual operating hours for Boiler No. 2 are limited to 6,240 hours per any consecutive 12-month period. The boiler has a design rating of 50,000 pounds per hour (lb/hr) steam, and is fired by natural gas at a maximum design heat input rate of 64.9 million British thermal units per hour (MMBtu/hr). Boiler No. 2 is limited to 64.9 MMBtu/hr and 64,900 standard cubic feet per hour (scf/hr) of natural gas, on

a monthly average basis. The combined natural gas usage for Boiler Nos. 1, 2, and 3 is limited to 992.0 million scf per any 12 consecutive month period.

No. 2 fuel oil can be burned as backup in Boiler No. 2, but fuel oil has not been burned in the boiler for several years. The maximum permitted rate of fuel oil firing is 463.6 gallons per hour, on a monthly average basis. The maximum sulfur content of the fuel oil is limited to 0.30 percent. The combined fuel oil usage for Boiler Nos. 1, 2 and 3 is limited to 5,439,000 gallons per any consecutive 12-month period.

During the summer of 2000, CCP replaced the steam tubes in Boiler No. 2. The combustion chamber refractory, casing and insulation were at this time removed to gain access to the steam tubes. These components were replaced after the new steam tubes were installed. The primary purpose of the boiler tube replacement was to repair boiler tube leaks in the boiler. The boiler had lost steam production capacity as a result of the leaks. The steam drum of the boiler, the major component, was not replaced.

As part of this application, CCP is requesting an increase in the annual hours of operation from 6,240 to 8,760. This increase in hours would allow CCP flexibility in operations. CCP is also proposing a sulfur content limit of 0.05 percent as best achievable control technology (BACT) for particulate matter (PM) and sulfur dioxide (SO_2) control as required by Rule 62-296.406, F.A.C.

Boiler No. 2 has not fired fuel oil for many years. As a result, the potential emissions from fuel oil firing can potentially exceed PSD significant emission rates at the current permitted rate. To keep emissions below PSD significance levels, CCP is proposing to limit the maximum sulfur content to 0.05 percent and the annual fuel oil usage for Boiler No. 2 to 3,400,000 gallons per year, which is equivalent to burning 477.2 gallons of fuel oil per hour for 7,125 hours per year. Annual usage of natural gas does not need to be limited to insure that emissions stay below PSD significance levels. The maximum potential emissions of Boiler No. 2 based on the proposed annual hours of operation and annual limitation for No. 2 fuel oil are presented in Attachment GP-EU1-G8.

3.0 RULE APPLICABILITY

3.1 NSPS REVIEW

NSPS Subpart Dc is applicable to each steam-generating unit for which construction, modification, or reconstruction is commenced after June 9, 1989, and that has a maximum design heat input rate of 100 MMBtu/hr or less, but greater than or equal to 10 MMBtu/hr. Under Subpart Dc, only opacity and sulfur dioxide (SO_2) emissions are regulated. The definitions of three terms, "construction", "modification", and "reconstruction" are critical in determining the applicability of Subpart Dc to the proposed refurbishment of the boiler. The Keeler Boiler is an existing unit which has been in service since the mid-1970s, so the term "construction" does not apply to the repairs to the boiler.

The term "modification" does not apply to the repairs to the Keeler Boiler because no increase in the emission rate of SO_2 or opacity will result from this project, nor will new regulated pollutants be emitted. The repairs performed on Boiler No. 2 cost less than 50 percent of the cost of a new comparable boiler (refer to Appendix A for cost analysis); therefore, the repairs made to Boiler No. 2 cannot be considered "reconstruction". Since the repairs made to Boiler No. 2 do not fall under any of the above categories, Boiler No. 2 is not subject to NSPS. FDEP's concurrence with Boiler No. 2 not being subject to NSPS, Subpart Dc is presented in FDEP's permit determination (refer to Appendix B).

3.2 PSD REVIEW

Under Federal and State of Florida PSD review requirements, all major new or modified sources of air pollutants regulated under the Clean Air Act (CAA) must be reviewed and a pre-construction permit issued. EPA has approved Florida's State Implementation Plan (SIP), which contains PSD regulations; therefore, PSD approval authority has been granted to the FDEP.

A "major facility" is defined as any one of 28 named source categories that have the potential to emit 100 TPY or more or any other stationary facility that has the potential to emit 250 TPY or more of any pollutant regulated under CAA. "Potential to emit" means the capability, at maximum design capacity, to emit a pollutant after the application of control equipment. Once a new source is determined to be a "major facility" for a particular pollutant, any pollutant emitted in amounts greater than the PSD significant emission rates is subject to PSD review. For an existing source for which a modification is proposed, the modification is subject to PSD review if the net increase in emissions due to the modification is greater than the PSD significant emission rates.

FDEP has previously determined that this project is not "routine maintenance, repair and replacement" as stated in 40 CFR 52.21(b)(2)(iii)(a) and Rule 62-212.400, F.A.C. To determine PSD applicability for the project, the increase in emissions must be compared to the PSD significant emission rates. A comparison of the future potential emissions for Boiler No. 2 and the PSD significant emission rates is presented in Table 1. None of the potential emissions from Boiler No. 2 exceed the PSD significant emission rates; therefore, PSD does not apply to this project.

The proposed changes will not have an effect for any downstream sources at CCP. The request for additional operating hours for Boiler No. 2 is to allow flexibility in operations. Currently, Boiler No. 2 is not a bottleneck for the operations at the CCP facility.

3.3 SMALL BOILER BACT ANALYSIS

As per Rule 62-296.406, F.A.C., Boiler No. 2 is subject to a BACT analysis for PM and SO_2. CCP is proposing a maximum sulfur content of 0.05 percent in the No. 2 fuel oil burned by Boiler No. 2 to control both PM and SO_2 emissions. This control technology is equivalent to other BACT determinations made for small boilers, so no other control options were considered.

Table 1. Potential Emissions for Boiler No. 2, CCP Frostproof

Pollutant	Potential Emissions [a] (TPY)	PSD Significant Rate (TPY)	PSD Review Applies?
Particulate Matter (PM)	3.80	25	No
Particulate Matter (PM_{10})	2.16	15	No
Sulfur Dioxide	12.10	40	No
Nitrogen Oxides	39.31	40	No
Carbon Monoxide	23.88	100	No
Volatile Organic Compounds	1.56	40	No

Footnotes:

[a] See Attachment CC-EU1-G8 for calculations.

APPENDIX A

MARCH 1, 2001 LETTER FROM GOLDER ASSOCIATES

Golder Associates Inc.

6241 NW 23rd Street, Suite 500
Gainesville, FL 32653-1500
Telephone (352) 336-5600
Fax (352) 336-6603

March 1, 2001

0037603

Florida Department of Environmental Protection
Southwest District
3804 Coconut Palm Drive
Tampa, FL 33619

Attention: Mr. Bill Thomas, Air Administrator

RE: CARGILL CITRO PURE, L. P.
FROSTPROOF CITRUS PLANT
BOILER NO. 2 REPAIRS

Dear Mr. Thomas:

Cargill Citro Pure, L. P. (CCP) owns and operates a citrus processing plant located in Frostproof, Polk County, Florida. As part of the operations, three steam boilers are operated, including Boiler No. 2. Boiler No. 2 is an E. Keeler Company steam boiler manufactured in 1975. The boiler has a design rating of 50,000 pounds per hour (lb/hr) steam, and is fired by natural gas at a maximum design heat input rate of 64.9 million British thermal units per hour (MMBtu/hr). No. 2 fuel oil can be burned as backup, but fuel oil has not been burned in the boiler for several years. Maximum annual operating hours for the boiler are limited to 6,240 hours per any consecutive 12-month period (reference Title V Final Permit No. 1050019-003-AV).

During the past summer, CCP performed certain repairs on Boiler No. 2. The repairs included dismantling of 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 existing steam tubes. Historically, such activity would be categorized as routine repair and replacement. However, the U.S. Environmental Protection Agency (EPA) has recently issued several determinations addressing the definition and the criteria used in determining routine replacement and repair.

The purpose of this submittal is to present the details of the repairs, including costs, to request concurrence that the activities were indeed routine maintenance and repair. In addition, the applicability of "reconstruction," as defined under 40 Code of Federal Regulations (CFR) Part 60, is addressed. If reconstruction were triggered, then the boiler could be subject to New Source Performance Standards (NSPS), 40 CFR Subpart Dc.

Routine Repair and Replacement

The attached chart presents an analysis of CCA's boiler tube replacement project based on the EPA criteria. Although Boiler No. 2 is approximately 25 years old, it has only been operated on a seasonal basis. The primary purpose of the boiler tube replacement was to repair boiler tube leaks in the boiler. The boiler had lost steam production capacity as a result of the leaks. The steam drum of the boiler, the major component, is not being replaced. The cost of the retubing is approximately 29% of the cost of an entirely new boiler. All of the costs of the tube replacement are coming out of operating expense budgets.

It is believed that the retubing work on Boiler No. 2 constitutes routine replacement for this boiler.

Reconstruction Under NSPS

NSPS Subpart Dc is applicable to each steam-generating unit for which construction, modification, or reconstruction is commenced after June 9, 1989, and that has a maximum design heat input rate of 100 MMBtu/hr or less, but greater than or equal to 10 MMBtu/hr. The definitions of three terms, "construction", "modification", and "reconstruction" are critical in determining the applicability of Subpart Dc to the proposed refurbishment of the boiler. If the repairs on Boiler No. 2 were considered to be construction, modification, or reconstruction, NSPS Subpart Dc would be applicable to the boiler.

The term "construction" is defined in 40 CFR 60.2 (NSPS, Subpart A - General Provisions) as fabrication, erection, or installation of an affected facility. For this discussion, an "affected facility" is one that is subject to the provisions of Subpart Dc. To be an affected facility due to the term "construction", the Keeler Boiler would have had to have been fabricated, erected, or installed after June 9, 1989. The Keeler Boiler is an existing unit which has been in service since the mid-1970s, so the term "construction" does not apply to the repairs to the boiler.

The term "modification" is defined in 40 CFR 60.2 as any physical change, or change in the method of operation, of an existing facility which increases the emissions to the atmosphere of any pollutant to which a standard applies, or which results in emissions of any air pollutant not previously emitted and to which a standard applies. Under Subpart Dc, only opacity and sulfur dioxide (SO_2) emissions are regulated. The term "modification" does not apply to the repairs to the Keeler Boiler because no increase in the emission rate of SO_2 or opacity will result from this project, nor will new regulated pollutants be emitted. This is because the heat input rate or fuel usage rate will not increase, and the fuels utilized will not change.

The term "reconstruction" is defined in 40 CFR 60.15 (NSPS, Subpart A – General Provisions) as the replacement of components of an existing facility to such an extent that:

(1) the fixed capital cost of the new components exceeds 50 percent of the fixed capital cost that would be required to construct a comparable entirely new facility, and
(2) it is technically and economically feasible to meet the applicable standards set forth in this part.

The term "fixed capital cost" is defined as the capital needed to provide all depreciable components (40 CFR 60.15). As described in a November 25, 1986 memorandum from EPA regarding the definition of reconstruction, the December 16, 1975 preamble to the reconstruction regulations states that "fixed capital cost" includes the labor and engineering costs of designing and installing components of the affected facility, but not costs associated with land, site preparation, or demolition of existing facilities. Determining the applicability of the term "reconstruction" to the repair of the Keeler Boiler requires an analysis of the fixed capital cost of the refurbishment compared to the fixed capital cost of replacing the boiler with a similar unit. A breakdown of the costs associated with the planned refurbishment, based on the attached quotation from Industrial Engineering Co., dated June 23, 2000, is presented in the following table.

Cost of Repairing the Keeler Boiler

Description of Task	Labor Cost and Expenses	Cost of Components/ Materials	Total Cost Allowed* as a "Fixed Capital Cost"
Demo and Dismantling	$3,753	$0	$0
Cleaning and Pressure Vessel Preparation	$7,500	$0	$7,500
Worksite Preparation	$14,500	$0	$14,500
Tube Replacement	$30,250	$42,750	$73,000
Refractory and Insulation Replacement	$6,800	$9,275	$16,075
Casing Replacement	$4,200	$6,100	$10,300
Painting, Pressure Testing, Misc.	$2,500	$1,750	$4,250
Total Cost	$69,503	$59,875	$125,625

* Does not include cost demolition of existing facilities. Excludes costs not associated directly with the boiler.

A breakdown of costs to replace the boiler with a similar unit, based on the attached quotation from Industrial Engineering Company, dated September 7, 2000, is presented below. Notice that the cost of the low-NO_x configuration was not included.

Cost of Replacing the Keeler Boiler

Component	Freight and Installation Cost*	Parts and Labor Cost	Total Installed Cost
50,000 lb/hr Steam Boiler	$20,000	$420,000	$440,000

* Excludes cost of land, site preparation, or demolition of existing facilities.

As presented above, the component cost of the planned repairs is $130,000. This cost is less than 50 percent of the cost of $440,000 for a completely new comparable boiler (130,000/440,000 = 29 percent). Based on the costs of repairing or replacing the Keeler Boiler provided by Industrial Engineering, Co., the planned repairs to Boiler No. 2 cannot be considered "reconstruction", as defined in NSPS Subpart Dc.

Since the repairs to Boiler No. 2 cannot be considered "construction", "modification", or "reconstruction" as defined in 40 CFR 60, Subpart Dc, is not applicable to the proposed project.

Air Emissions For Boiler No. 2

Presented in Table 1 are the estimated maximum air emissions from Boiler No. 2 while firing natural gas. The maximum emissions are less that the prevention of significant deterioration (PSD) significant emission rates, which are also shown in the table.

CCP desires to determine if any further air permitting action is necessary for the Boiler No. 2 retubing project.

Please review this information and advise if any additional information is required.

Sincerely,
GOLDER ASSOCIATES INC.

David a. Buff

David A. Buff, P.E. Q.E.P.
Principal Engineer
Florida P.E. # 19011
SEAL

DAB/nav

cc: Larry Hadden
Tom MacLeod
A. A. Linero

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Table 1. Potential Emissions for Boiler No. 2 Firing Natural Gas, CCP Frostproof

Parameter	Boiler No. 2
Operating Time (hr/yr)	5,376
Hourly Heat Input Rate (MMBtu/hr)	64.9
Annual Heat Input Rate (MMBtu/yr)	348,902
Hourly Natural Gas Use (MMscf/hr) [a]	0.0649
Annual Natural Gas Use (MMscf/yr)	348.9

Pollutant		Emission Factor[b]	Pollutant Emissions (lb/hr)	Pollutant Emissions (TPY)	PSD Significant Emission Rate (TPY)
PM	Natural Gas	7.6 lb/MMscf	0.49	1.3	25
PM10	Natural Gas	7.6 lb/MMscf	0.49	1.3	15
SO2	Natural Gas	0.6 lb/MMscf	0.039	0.1	40
NOx	Natural Gas	100 lb/MMscf	6.49	17.4	40
VOC	Natural Gas	5.5 lb/MMscf	0.36	1.0	40
CO	Natural Gas	84 lb/MMscf	5.45	14.7	100
Lead	Natural Gas	0.0005 lb/MMscf	3.25E-05	8.72E-05	0.6

References:

[a] Based on 1,000 Btu/scf.

[b] Emission factors based on AP-42 Section 1.4, Tables 1.4-1 and 1.4-2 for small boilers (2/98).

Cargill Citro Pure, L. P.
Frostproof Citrus Plant
Routine Maintenance and Boiler Retubing for Boiler No. 2
December 12, 2000

Criteria Based on EPA May 23, 2000 Guidance		CCP Frostproof Boiler No. 2 Retubing
Nature 1. Whether major components of the facility are being modified or replaced 2. Whether the unit is of considerable size, function, or importance to the operation of the facility 3. Whether the source itself has characterized the change as non-routine 4. Whether the change could be performed during full functioning of the facility or while it was in full working order 5. Whether the materials, equipment and resources necessary to carry out the planned activity are already on site		Replacement of the existing boiler steam tubes; replace removed refractory, casing and insulation; hydrostatic pressure testing of tubes 1. The boiler tubes are a small component of the facility in terms of size. Total number of tubes is 994. Magnitude of cost is small (approx. $130,000), and much less than the cost of an entirely new boiler (approx. 29% of the cost of a new boiler). 2. Boiler No. 2 is one of three boilers at the facility, comprising about 38% of the total steam capacity. Boiler No. 3 is permitted for year-around use, while Boiler Nos. 1 and 2 have limited hours of operation and are operated almost exclusively during the citrus processing season. 3. CCP considers this project to be routine, as it is common for steam tubes to eventually be replaced on every boiler. 4. Boiler maintenance conducted annually and unit shutdowns occur each year during off-season; will not affect unit's availability during the citrus processing season. 5. Replacement components, such as steam tubes, manufactured off-site.
Extent 1. Whether an entire emissions unit will be replaced 2. Whether the change will take significant time to perform 3. Whether the collection of activities, taken as a whole, constitutes a non-routine effort, notwithstanding that individual elements could be routine 4. Whether the change requires the addition of parts to existing equipment		1. The entire Boiler No. 2 is not being replaced, only the steam tubes, which is a component part. 2. The replacement required approximately a two-month period during the off-season, when the unit was already shut down. The boiler tubes were replaced during the same time period when normal maintenance on the boiler is performed. 3. The boiler tubes on this boiler have not been previously replaced. Annual repairs to the refractory are performed. 4. No additional parts are required. All of the parts are replacement parts.

Cargill Citro Pure, L. P.
Frostproof Citrus Plant
Routine Maintenance and Boiler Retubing for Boiler No. 2
December 12, 2000

Criteria Based on EPA May 23, 2000 Guidance		CCP Frostproof Boiler No. 2 Retubing
Purpose 1. Whether the purpose of the effort is to extend the useful life of the units; similarly, whether the source proposes to replace a unit at the end of its useful life 2. Whether the modification will keep the unit operating in its present condition, or whether it will allow enhanced operation (e.g., will it permit increased capacity, operating rate, utilization, or fuel adaptability)	▪	1. The existing boiler and boiler tubes could continue to be operated, although at lower fuel efficiency. The boiler tube replacement could extend the useful life of the unit, although the main component of the boiler, the steam drum, is not being replaced, and could conceivably last another 25 years. 2. The replacement will allow some increase in steam production rate that has been lost due to boiler tube leakage. No more fuel will be burned to produce the greater amount of steam; however, there is continuous economic incentive to decrease (not increase) boiler usage. The steam needs of the plant remain the same, regardless of the boiler's efficiency in fuel use. Boiler No. 2 will operate as it has in the past; with a slight increase in steam production capacity; no increase in utilization; no increase in fuel use or air emissions.
Frequency 1. Whether the change is performed frequently in a typical unit's life	▪	1. The boiler tubes are not dismantled and replaced annually.
Cost 1. Whether the change will be costly, both in absolute terms and relative to the cost of replacing the unit 2. Whether a significant amount of the cost of the change is included in the source's capital expenses, or whether the change can be paid for out of the operating budget (i.e., whether the costs are reasonably reflective of the costs originally projected during the source's or unit's design phase as necessary to maintain the day-to-day operation of the source)	▪	1. Cost is $130,000 for entire project: --$60,000 for parts --$70,000 for labor Magnitude of cost is small (approx. $130,000). The cost of a new boiler is estimated at $441,000, based on a recent vendor quote, making the tube replacement only 29% of the total replacement cost. 2. 100 % of the total costs are expenses being paid out of the current operating expense budget.

APPENDIX B

FDEP PERMIT DETERMINATION

Department of
Environmental Protection

Jeb Bush
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

David B. Struhs
Secretary

NOTICE OF PERMIT DETERMINATION

CERTIFIED MAIL

April 27, 2001

Mr. Edmur deOliveira
Plant Operations Manager
Cargill Citro Pure, L.P.
100 East 6th Street
Frostproof, FL 33843

Re: Letter Dated March 1, 2001 from Golder Associates Inc.
Boiler No. 2 Repairs
Permit Applicability Determination

Dear Mr. deOliveira:

On March 1, 2001, the Department received a request from Mr. David A. Buff, P.E., Q.E.P., of Golder Associates, Inc. on behalf of Cargill Citro Pure, L.P. concerning the repairs made to Boiler No. 2 and whether there were any permitting requirements. The letter contained a description of why the Boiler repair project was not subject to the New Source Performance Standard (NSPS) and the New Source Review-Prevention of Significant Deterioration (NSR-PSD) Rule.

The repairs to the boiler included replacement of refractory and casing (necessary for access purposes to the steam tubes), and replacement of the steam tubes. The Department concurs that the repairs made to the boiler are not subject to the NSPS requirements, based upon the financial analysis provided. The Department believes the repairs do constitute a modification, as defined in Rule 62-210.200, F.A.C., Definitions-Modification. This is based upon future potential emissions (specifically, sulfur dioxide emissions) from fuel oil combustion, which could result in an actual emissions increase. The potential increase in sulfur dioxide emissions is above the PSD significance level of 40 tons per year, which would require a PSD review. The Environmental Protection Agency (EPA) has considered similar modifications to be in violation of NSR-PSD requirements (see October 14, 1988 Wisconsin Electric Power Company Final Determination). The Department does not consider the Boiler No. 2 repair to be

MAY - 2 2001

"Routine maintenance, repair and replacement" as stated in the Code of Federal Regulations, 40 CFR 52.21(b)(2)(iii)(a).

The Department has determined that one of the following permitting actions is necessary:

1) An after-the-fact air construction permit is required to limit the emissions from the new boiler below the PSD significance criteria, or;
2) A PSD air construction permit is required to operate the Boiler at maximum permitted capacity.

Electronic Versions of air permit application forms (for Title V and non-Title V sources) are posted on the Division of Air Resource Management's World Wide Website. The website address is: http://www.dep.state.fl.us/air/forms/forms.htm

Please submit a completed application with the appropriate fee within 90 days of receipt of this letter to the Department of Environmental Protection, 3804 Coconut Palm Drive, Tampa, FL, 33619.

If you have any questions, please contact Jason Waters of my staff at (813) 744-6100, x105.

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, F.S. 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 21 days of receipt of this notice. 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, F.A.C.

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, 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 action; and

(f) A statement of 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 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, F.A.C.

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 permit determination. 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 filing 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.

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 EPA and by the person under the Clean Air Act unless and until Administrator separately approves any variance or waiver in accordance with the procedures of the federal program.

This permit determination is final and effective on the date filed with the Clerk of the Department unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57, F.S. or unless a request for an extension of time in which to file a petition is filed within the time specified for filing a petition. Upon timely filing of a petition or a request for an extension of time to file the petition, this permit determination will not be effective until further Order of the Department.

Any party to the Order (Permit Determination) has the right to seek judicial review of the Order pursuant to Section 120.68, F.S., by the filing of 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, Douglas Building, 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 of Appeal must be filed within 30 days after this Order is filed with the Clerk of the Department.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

W.C. Thomas, P.E.
District Air Program Administrator

CERTIFICATE OF SERVICE

This is to certify that this NOTICE OF PERMIT DETERMINATION was sent to the addressee by certified mail and all copies were sent by regular mail before the close of business on 4/30/01 to the listed persons, unless otherwise noted.

Mr. Edmur deOliveira
Plant Operations Manager
Cargill Citro Pure, L.P.
100 East 6th Street
Frostproof, FL 33843

Mr. David A. Buff, P.E., Q.E.P.
Golder Associates, Inc

Clerk Stamp

FILING AND ACKNOWLEDGEMENT FILED, on this date, pursuant to 120.52(7), Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledge.

Carol S. Moore (Clerk) 4-30-01 (Date)

APPENDIX C

COPY OF TITLE V REQUIREMENTS FOR BOILER NO. 2

Department of
Environmental Protection

Jeb Bush
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

David B. Struhs
Secretary

Permittee:
Cargill Citro-America, Inc.

Final Permit No.: 1050019-003-AV
Facility ID No.: 1050019
SIC Nos.: 20, 2037
Project: Initial Title V Air Operation Permit

This permit is for the operation of the Frostproof citrus processing facility and sprayfield. The citrus processing facility is located at 5th Street and US Alt Highway 27, Frostproof, Polk County; UTM Coordinates: Zone 17, 448.0 km East and 3068.5 km North; Latitude: 27° 44' 22" North and Longitude: 81° 31' 58" West. The spray field is located at Latitude: 27° 40' 00" North and Longitude: 81° 30' 00".

STATEMENT OF BASIS: This Title V air operation permit 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 perform the work or 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 TV-3, TITLE V CONDITIONS (version dated 04/30/99)
APPENDIX SS-1, STACK SAMPLING FACILITIES (version dated 10/7/96)
TABLE 297.310-1, CALIBRATION SCHEDULE (version dated 10/7/96)
BACT Determination dated December 13, 1985, for Boiler No. 3
BACT Determination dated January 26, 1994, for Boiler Nos. 1 and 2.

Effective Date: June 5, 2000
Renewal Application Due Date: December 8, 2004
Expiration Date: June 5, 2005

FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION

W.C. Thomas, P.E.
District Air Program Administrator

JLM

Final Permit No.: 1050019-003-AV

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

E.U. ID No.	Brief Description
-004	Boiler No. 1
-005	Boiler No. 2
-007	Boiler No. 3

Boiler No. 1
Boiler No. 1 is a Erie City process steam boiler fired on natural gas or No. 2 (distillate) fuel oil with a maximum sulfur content of 0.30% by weight, at a maximum design heat input rate of 66.3 MMBtu/hour (corresponds to 66,300 scf/hour of natural gas or 473.6 gallons/hour of No. 2 oil @ 140,000 Btu/gallon). Maximum operating hours are 5,376 hours per any consecutive 12 month period.

Boiler No. 2
Boiler No. 2 is a E. Keeler Company process steam boiler fired on natural gas or No. 2 (distillate) fuel oil with a maximum sulfur content of 0.30% by weight, at a maximum design heat input rate of 64.9 MMBtu/hour (corresponds to 64,900 scf/hour of natural gas or 463.6 gallons/hour of No. 2 oil @ 140,000 Btu/gallon). Maximum operating hours are 6,240 hours per any consecutive 12 month period.

Boiler No. 3
Boiler No. 3 is a Cleaver-Brooks Model D-52 process steam boiler fired on natural gas only, at a maximum design heat input rate of 38.9 MMBtu/hour (corresponds to 38,900 scf/hour). Maximum operating hours are 8,760 hours/year.

{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, New and Existing Units.}

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

Essential Potential to Emit (PTE) Parameters

B.1. Capacity.
a. The maximum heat input to Boiler No. 1 shall not exceed 66.3 MMBtu per hour (monthly average basis).
b. The maximum heat input to Boiler No. 2 shall not exceed 64.9 MMBtu per hour (monthly average basis).
c. The maximum heat input to Boiler No. 3 shall not exceed 38.9 MMBtu per hour (monthly average basis).

Final Permit No.: 1050019-003-AV

d. The maximum fuel firing rate to Boiler No. 1 shall not exceed 473.6 gallons per hour of No. 2 fuel oil or 66,300 standard cubic feet per hour of natural gas (monthly average basis).
e. The maximum fuel firing rate to Boiler No. 2 shall not exceed 463.6 gallons per hour of No. 2 fuel oil or 64,900 standard cubic feet per hour of natural gas (monthly average basis).
f. The maximum fuel firing rate to Boiler No. 3 shall not exceed 38,900 standard cubic feet per hour of natural gas (monthly average basis).
g. Total natural gas usage from all of the boilers combined shall not exceed 992.0 million standard cubic feet per any 12 consecutive month period.
h. Total No. 2 fuel oil usage from all of the boilers combined shall not exceed 5,439,000 gallons per any 12 consecutive month period.

[Rules 62-4.160(2) and 62-210.200, F.A.C., Definitions - (PTE); BACT Determination January 26, 1994; AC53-243273; BACT Determination December 13, 1985]

B.2. Methods of Operation - (i.e., Fuels).

a. Boiler Nos. 1 and 2 shall be fired with only natural gas or new No. 2 fuel oil with a maximum sulfur content of 0.30% by weight. No used or recycled oil shall be fired.
b. Boiler No. 3 shall be fired with natural gas only.

[Rules 62-210.200(233), 62-4.160(2), and 62-213.440(1), F.A.C.; BACT Determination January 26, 1994; AC53-243273; BACT Determination December 13, 1985]

B.3. Hours of Operation.

1. The hours of operation for Boiler No. 1 shall not exceed 5,376 hours per any 12 consecutive month period.
2. The hours of operation for Boiler No. 2 shall not exceed 6,240 hours per any 12 consecutive month period.
3. The hours of operation for Boiler No. 3 are not limited.

{Permitting Note: A boiler is considered in operation any time fuel is being fired.}
[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; AC53-243273]

Emission Limitations and Standards

B.4. Visible emissions from Boiler Nos. 1, 2, and 3 shall not exceed 20% opacity, except for one two-minute period per hour during which opacity shall not exceed 40%.
(Permitting Note: BACT Determination dated December 13, 1985, erroneously limited Boiler No. 3's visible emissions to 5% opacity.)
[Rule 62-296.406(1), F.A.C.]

Test Methods and Procedures

B.5. Boilers No. 1 & 2 shall be tested for visible emissions annually on or during the 60 day period prior to February 11, in accordance with the qualifications of Condition B.8. In addition, Boilers Nos. 1 and 2 shall each be tested for visible emissions within 30 days of the first use of No. 2 fuel oil in each of the respective boilers after the effective date of this permit. During the 12-month period prior to permit renewal, Boiler No. 3 shall be tested for visible emissions on or during the 8 - 12 month period prior to expiration date of this permit. The permittee shall submit a statement of the fuel heat input rate, fuel firing rate, and a description of the fuel in use as a part of the compliance test report. Failure to submit the firing rates, or operating under conditions that are not representative of normal operation, may fail to provide reasonable assurance of compliance.
[Rules 62-297.310(7)(a)4. and 62-4.070(3), F.A.C.]

B.6. Compliance with the limitations of Condition B.4 shall be determined using DEP Method 9 contained in Chapter 62-297, F.A.C. Compliance testing of these boilers shall be accomplished during a period when they are cycling up to a normal high firing rate, or they are continuously operating at a high firing rate. The minimum requirements for stationary point source emission test procedures and reporting shall be in accordance with Chapter 62-297, F.A.C. and 40 CFR 60 Appendix A.
[Chapter 62-297, F.A.C.]

B.7. The visible emissions tests shall be conducted by a certified observer and be a minimum of sixty (60) minutes in duration for Boiler Nos. 1, 2, and 3. The test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur.
[Rule 62-297.310, F.A.C.]

B.8. Compliance testing on Boiler Nos. 1 and 2 shall be performed while burning No. 2 fuel oil if the boiler has burned oil for more than a total of 400 hours in the prior 12-month period. If either boiler has not burned fuel oil for a total of 400 hours or more in the prior 12-month period, the test for that year is waived. However , in the 12-month period prior to permit renewal, the test may not be waived. If annual testing has been waived and No. 2 fuel oil is fired in the boiler for more than 400 hours prior to the next scheduled annual compliance test, then testing shall be conducted on that boiler using No. 2 fuel oil within 30 days of exceeding the 400th hour of firing fuel oil in that boiler. A statement of the fuel type and fuel firing rate shall be included with all test reports. Failure to submit the firing rates, or operating under conditions that are not representative of normal operation, may fail to provide reasonable assurance of compliance.
[Rule 62-4.070(3), F.A.C.; AC53-269709; AC53-252234]

B.9. Compliance with the fuel oil sulfur content limitation of Condition B.2 shall be demonstrated during VE compliance tests through submission of either of the following with the test report:

a. Results of fuel oil analysis from the fuel oil vendor showing the sulfur content representative of the fuel fired during the compliance test;

b. Results of fuel oil analysis (conducted according to the appropriate ASTM method of 62-297.440, F.A.C.) showing the sulfur content for a fuel oil sample taken during the compliance test.

[Rules 62-297.440 and 62-4.070(3), F.A.C.]

Recordkeeping and Reporting Requirements

B.10. In order to document continuing compliance with the fuel oil sulfur content limitation of Condition B.2, records of the sulfur content, in % by weight, of the No. 2 fuel oil used in the boilers shall be kept, based on either vendor provided as-shipped analysis, or on analysis of as-received samples taken at the plant.
[Rule 62-213.440(1), F.A.C.]

B.11. In order to document compliance with the requirements of Conditions B.1., B.2., and B.3, the permittee shall maintain the following records:

Daily

a. For each Boiler No. 1 and Boiler No. 2:

1. the total operating hours of burning natural gas;
2. the total operating hours of burning No. 2 fuel oil.

Monthly

b. For each Boiler No. 1 and Boiler No. 2 record the total hours of burning natural gas and the total hours of burning No. 2 fuel oil.
c. For Boiler No. 3 record the total hours of burning natural gas.
d. For each boiler record the most recent 12 consecutive month total operating hours.
e. For each boiler record the quantity of natural gas used in standard cubic feet.
f. For each boiler record the quantity of No. 2 fuel oil used in gallons.
g. For each boiler record the monthly average heat input rate in MMBtu/hour.
h. For each boiler record the monthly average No. 2 fuel oil usage rate in gallon/hour.
i. For each boiler record the monthly average natural gas usage rate in standard cubic feet per hour.

j. Record the most recent 12 consecutive month period total usage of natural gas for all 3 boilers combined in million standard cubic feet.
k. Record the most recent 12 consecutive month period total usage of No. 2 fuel oil for all 3 boilers combined in gallons.

Daily records shall be completed within 5 business days and monthly records shall be completed by the end of the following month. The records shall be recorded in a permanent form suitable for inspection by the Department upon request.
[Rule 62-213.440(1), F.A.C.; AC53-252234]