

Golder Associates Inc.

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



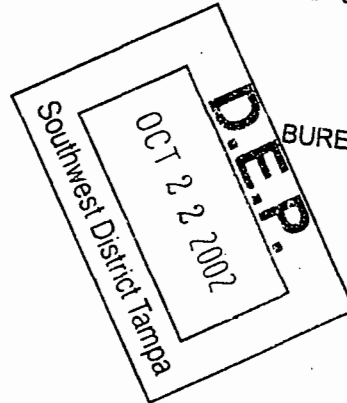
October 16, 2002

0137544

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

Attention: Mr. Gerald J. Kissel, P.E.

SUBJECT: Cargill Citro Pure, L.P.
Draft Title V Permit No. 1050019-008-AV
Revision to Delete No. 2 Peel Dryer



RECEIVED

OCT 28 2002

BUREAU OF AIR REGULATION

Dear Mr. Kissel:

Based on our recent discussion, Cargill Citro-America, Inc. (CCA), is submitting the attached revision to the Draft Title V permit for its citrus processing facility located in Frostproof, Florida. The draft permit was issued by the Department on April 18, 2002. As I discussed with you previously, our concern over the draft permit is the continued inclusion of the No. 2 Peel Dryer in the permit, since this peel dryer has never been constructed. We believe that since the No. 2 Peel Dryer has never been constructed, it should be removed from the Title V permit. In addition, the limitations on the existing peel dryer (No. 1 Peel Dryer) should be those contained in the previous construction permit for the dryer.

The construction permit for the No. 2 Peel Dryer (AC53-269709) was issued on November 9, 1995, and contained individual and combined process rate, and fuel usage limitations for both dryers. These limitations included individual process rate limitations of 51.0 tons per hour (TPH) of pressed peel for each peel dryer. However, these limitations were contingent upon the No. 2 Peel Dryer being constructed. The No. 2 Peel Dryer was never constructed, and therefore Construction Permit No. AC53-269709 was never implemented.

Since the No. 2 Peel Dryer construction permit was never implemented, the limitations on the No. 1 Peel Dryer should revert back to the previous construction permit. The previous construction permit for the No. 1 Peel Dryer, Permit No. AC53-243272, was issued on March 9, 1994. This permit was to modify the peel dryer by replacing the burner, increasing the permitted process rate and heat input rate to the dryer, and to implement other restrictions. This permit limited the No. 1 Peel Dryer to a process rate of 70.83 TPH of pressed peel. This construction was implemented and completed. The new burner was installed, and compliance testing was performed on February 13, 1995.

It is noted that any prevention of significant deterioration (PSD) new source review issues associated with the 1994 construction permit are being resolved through the Department's pending consent order with the citrus industry.

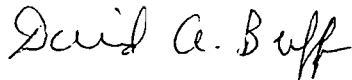
As part of the application for the peel dryer revision, we have included a marked up copy of the Draft Title V permit denoting the changes we believe are necessary to reflect the previous peel dryer construction permit.

We also request that the construction permit for the Boiler No. 2 repairs (Permit No. 1050019-007-AC) be extended to accommodate this delay. The current construction permit expired on July 31, 2002. We request that it be extended until March 31, 2003, to allow time for the Final Title V permit to be issued.

Thank you for consideration of these requests. If you have any questions, please call me at (352) 336-5600.

Sincerely,

GOLDER ASSOCIATES INC.



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

DB/arz

cc: Larry Hadden
Glenda Ellis

\\Gatorbait\dp\Projects\2001\0137544 Cargill Citro Pure\4.4\4.4.1 Frostproof\L101602.doc

DEP ROUTING AND TRANSMITTAL SLIP

TO: (NAME, OFFICE, LOCATION) 3. _____
 1. Ed Svec 4. _____
 2. DARM 5. _____

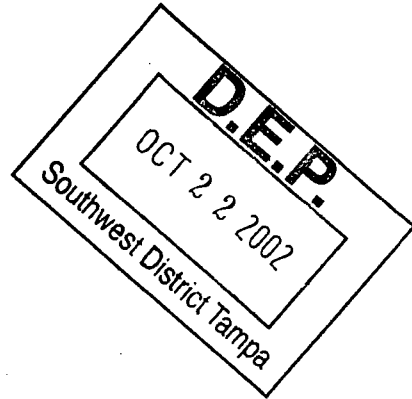
PLEASE PREPARE REPLY FOR:
 _____ SECRETARY'S SIGNATURE
 _____ DIV/DIST DIR SIGNATURE
 _____ MY SIGNATURE
 _____ YOUR SIGNATURE
 _____ DUE DATE _____

ACTION/DISPOSITION
 _____ DISCUSS WITH ME
 _____ COMMENTS/ADVISE
 _____ REVIEW AND RETURN
 _____ SET UP MEETING
 _____ FOR YOUR INFORMATION
 _____ HANDLE APPROPRIATELY
 _____ INITIAL AND FORWARD
 _____ SHARE WITH STAFF
 _____ FOR YOUR FILES

COMMENTS: FYI.
 We talked about this a few months back. SWD was processing a TV revision ^{to add a boiler} and had issued it draft (1050019-008-AV). The consultant commented on the draft - wanted Reel Dryes No. 2 removed. In talking with you, we decided that they have to send an application in to do this. We will process this application on top of the draft permit that was never published, and wrap this ~~up~~ in 1 revision. We are recycling the clock for project 008. IF you have any comments or questions, please

FROM: Eric Peterson DATE: 10/23/02 PHONE: _____
 call. Thanks, Eric

SC 512-1042 x107



**TITLE V PERMIT REVISION
TO REMOVE NO. 2 PEEL DRYER
CARGILL CITRO PURE, L.P.
FROSTPROOF PLANT**

RECEIVED

OCT 28 2002

BUREAU OF AIR REGULATION

Prepared For:

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

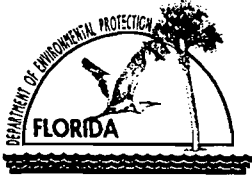
Prepared By:

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

**October 2002
0137544**

DISTRIBUTION:

- 4 Copies - FDEP**
- 2 Copies - Cargill Citro Pure, L.P.**
- 1 Copy - Golder Associates Inc.**



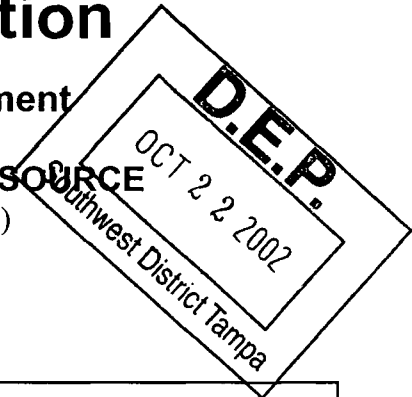
Department of Environmental Protection

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:	
2. Permit Number:	
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: 1050019-003-AV

Reason for revision: To remove Peel Dryer No. 2 from the permit since it was never constructed

Air Construction Permit Application

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

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>I, the undersigned, am the owner or authorized representative*(check here [], if so) or the responsible official (check here [X], 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.</i> Signature <u><i>Bryce Kelly</i></u> Date <u><i>10/21/02</i></u>

* 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

* Board of Professional Engineers Certificate of Authorization #00001670

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 [], 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 [X], 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

10/16/2002

Date

* Attach any exception to certification statement.

Scope of Application

Emissions Unit ID	Description of Emissions Unit	Permit Type	Processing Fee
001	No. 1 Citrus Peel Dryer/Waste Heat Evaporator		
006	Pellet Cooler		

Application Processing Fee

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

Construction/Modification Information

1. Description of Proposed Project or Alterations:
2. Projected or Actual Date of Commencement of Construction:
3. Projected Date of Completion of Construction:

Application Comment

The purpose of this application is to revise the Title V operating permit by removing the No. 2 Peel Dryer. The construction of the No. 2 Peel Dryer was authorized by Permit No. AC53-269709, which was issued on November 9, 1995. The construction permit for the No. 2 Peel Dryer contained individual and combined process rates and fuel usage limitations for both the new dryer and the existing No. 1 Peel Dryer. These limitations included individual process rate limitations of 51.0 ton per hour (TPH) of pressed peel for each dryer. The 51.0 TPH process rate is lower than the previously permitted process rate of 70.83 TPH for the existing No. 1 Peel Dryer. The No. 2 Peel Dryer was never constructed; therefore, Permit No. AC53-269709 was never implemented. The No. 2 Peel Dryer should be removed from the Title V operating permit and the process rate and fuel usage limitations for the No. 1 Peel Dryer should revert back to the limitations that existed prior to the issuance of Permit No. AC53-269709. A markup of the existing Title V permit containing the proposed revisions can be found in Attachment A.

Facility Regulatory Classifications

Check all that apply:

1. <input type="checkbox"/> Small Business Stationary Source?	<input type="checkbox"/> Unknown
2. <input checked="" type="checkbox"/> Major Source of Pollutants Other than Hazardous Air Pollutants (HAPs)?	
3. <input type="checkbox"/> Synthetic Minor Source of Pollutants Other than HAPs?	
4. <input checked="" type="checkbox"/> Major Source of Hazardous Air Pollutants (HAPs)?	
5. <input type="checkbox"/> Synthetic Minor Source of HAPs?	
6. <input type="checkbox"/> One or More Emissions Units Subject to NSPS?	
7. <input type="checkbox"/> One or More Emission Units Subject to NESHAP?	
8. <input type="checkbox"/> 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 03/01/02, except for 40 CFR 82.	
All Federal regulatory citations reflect the rule language as of September 2002.	
All State regulatory citations reflect the rule language as of September 2002.	
Only these rules, regulations, and ordinances specifically identified herein apply to this facility.	

Title V Core List

Effective: 03/01/02

[**Note:** The Title V Core List is meant to simplify the completion of the "List of Applicable Regulations" for 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.]

Federal: (description)

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 06-01-01

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 62-210, F.A.C.: STATIONARY SOURCES - GENERAL REQUIREMENTS, effective 06-21-01

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(5), F.A.C.: Notification of Startup.

62-210.300(6), F.A.C.: Emissions Unit Reclassification.

62-210.300(7), F.A.C.: Transfer of Air Permits.

Title V Core List

Effective: 03/01/02

- 62-210.350, F.A.C.: Public Notice and Comment.
- 62-210.350(1), F.A.C.: Public Notice of Proposed Agency Action.
- 62-210.350(2), F.A.C.: Additional Public Notice Requirements for Emissions Units Subject to Prevention of Significant Deterioration or Nonattainment-Area Preconstruction Review.
- 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.
- 62-210.400, F.A.C.: Emission Estimates.
- 62-210.650, F.A.C.: Circumvention.
- 62-210.700, F.A.C.: Excess Emissions.

- 62-210.900, F.A.C.: Forms and Instructions.
- 62-210.900(1), F.A.C.: Application for Air Permit – Title V Source, Form and Instructions.
- 62-210.900(5), F.A.C.: Annual Operating Report for Air Pollutant Emitting Facility, Form and Instructions.
- 62-210.900(7), F.A.C.: Application for Transfer of Air Permit – Title V and Non-Title V Source.

CHAPTER 62-212, F.A.C.: STATIONARY SOURCES - PRECONSTRUCTION REVIEW, effective 08-17-00

CHAPTER 62-213, F.A.C.: OPERATION PERMITS FOR MAJOR SOURCES OF AIR POLLUTION, effective 04-16-01

- 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.
- 62-213.415, F.A.C.: Trading of Emissions Within a Source.
- 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.
- 62-213.450, F.A.C.: Permit Review by EPA and Affected States
- 62-213.460, F.A.C.: Permit Shield.

- 62-213.900, F.A.C.: Forms and Instructions.
- 62-213.900(1), F.A.C.: Major Air Pollution Source Annual Emissions Fee Form.
- 62-213.900(7), F.A.C.: Statement of Compliance Form.

Title V Core List

Effective: 03/01/02

CHAPTER 62-296, F.A.C.: STATIONARY SOURCES - EMISSION STANDARDS, effective 03-02-99

62-296.320(4)(c), F.A.C.: Unconfined Emissions of Particulate Matter.

62-296.320(2), F.A.C.: Objectionable Odor Prohibited.

CHAPTER 62-297, F.A.C.: STATIONARY SOURCES - EMISSIONS MONITORING, effective 03-02-99

62-297.310, F.A.C.: General Test Requirements.

62-297.330, F.A.C.: Applicable Test Procedures.

62-297.340, F.A.C.: Frequency of Compliance Tests.

62-297.345, F.A.C.: Stack Sampling Facilities Provided by the Owner of an Emissions
Unit.

62-297.350, F.A.C.: Determination of Process Variables.

62-297.570, F.A.C.: Test Report.

62-297.620, F.A.C.: Exceptions and Approval of Alternate Procedures and Requirements.

Miscellaneous:

CHAPTER 28-106, F.A.C.: Decisions Determining Substantial Interests

**CHAPTER 62-110, F.A.C.: Exception to the Uniform Rules of Procedure, effective
07-01-98**

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 02-09-99

**CHAPTER 62-281, F.A.C.: Motor Vehicle Air Conditioning Refrigerant Recovery and
Recycling, effective 09-10-96**

B. FACILITY POLLUTANTS

List of Pollutants Emitted

1. Pollutant Emitted	2. Pollutant Classif.	3. Requested Emissions Cap		4. Basis for Emissions Cap	5. Pollutant Comment
		lb/hour	tons/year		
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 Monoxide
VOC	A				Volatile Organic Compounds
HAP	A				Hazardous Air Pollutants
H115	A				Methanol

C. FACILITY SUPPLEMENTAL INFORMATION

Supplemental Requirements

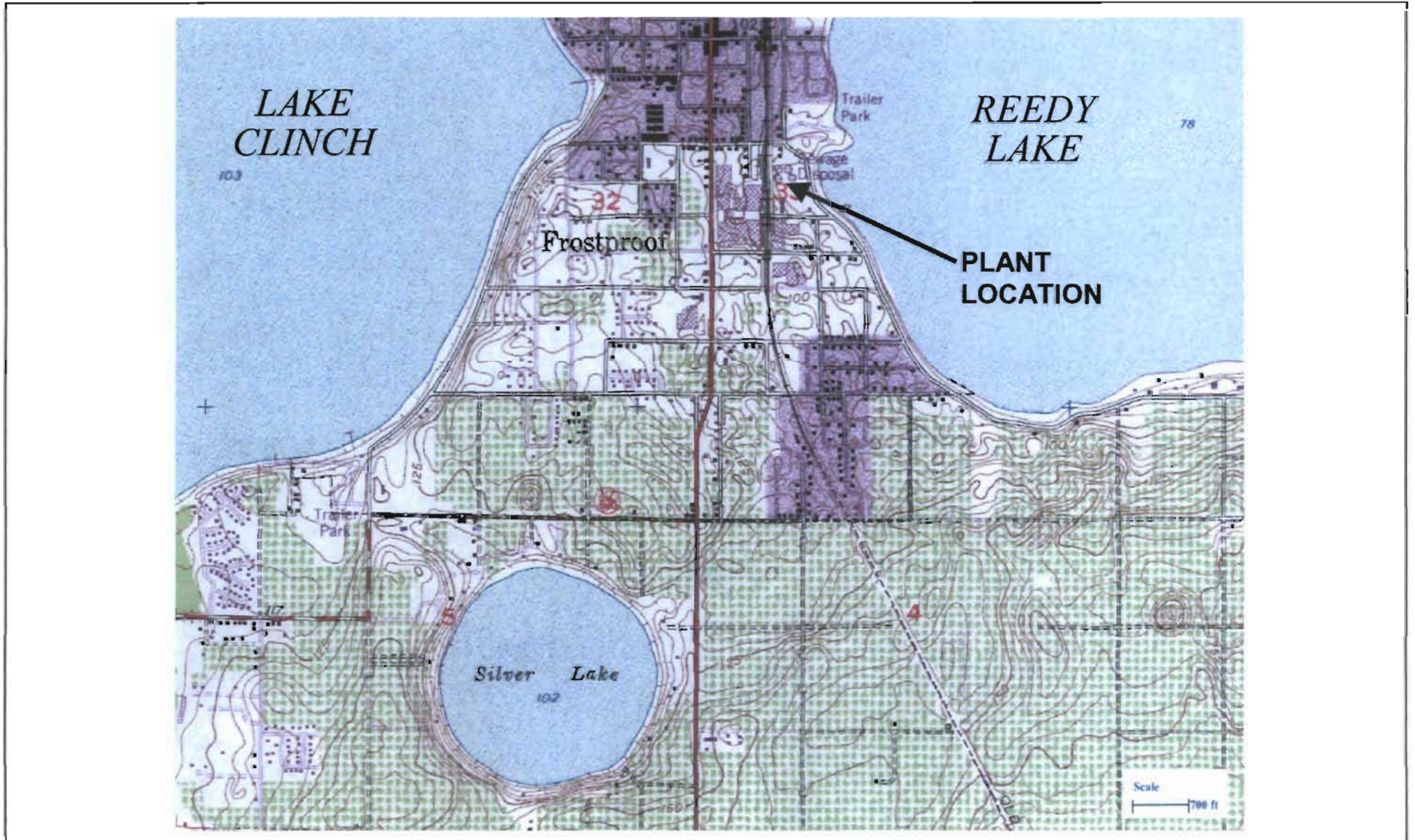
1. Area Map Showing Facility Location: [X] Attached, Document ID: <u>CC-FI-C1</u> [] Not Applicable [] Waiver Requested
2. Facility Plot Plan: [X] Attached, Document ID: <u>CC-FI-C2</u> [] Not Applicable [] Waiver Requested
3. Process Flow Diagram(s): [X] Attached, Document ID: <u>CC-FI-C3</u> [] Not 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: [] Attached, Document ID: _____ [X] Not Applicable
7. Supplemental Requirements Comment:

Additional Supplemental Requirements for Title V Air Operation Permit Applications

8. List of Proposed Insignificant Activities: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
9. List of Equipment/Activities Regulated under Title VI: <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Equipment/Activities On site but Not Required to be Individually Listed <input checked="" type="checkbox"/> Not Applicable
10. Alternative Methods of Operation: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
11. Alternative Modes of Operation (Emissions Trading): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
12. Identification of Additional Applicable Requirements: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
13. Risk Management Plan Verification: <input type="checkbox"/> 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: _____) <input type="checkbox"/> Plan to be submitted to CEPPO (Date required: _____) <input checked="" type="checkbox"/> Not Applicable
14. Compliance Report and Plan: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
15. Compliance Certification (Hard-copy Required): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> 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.



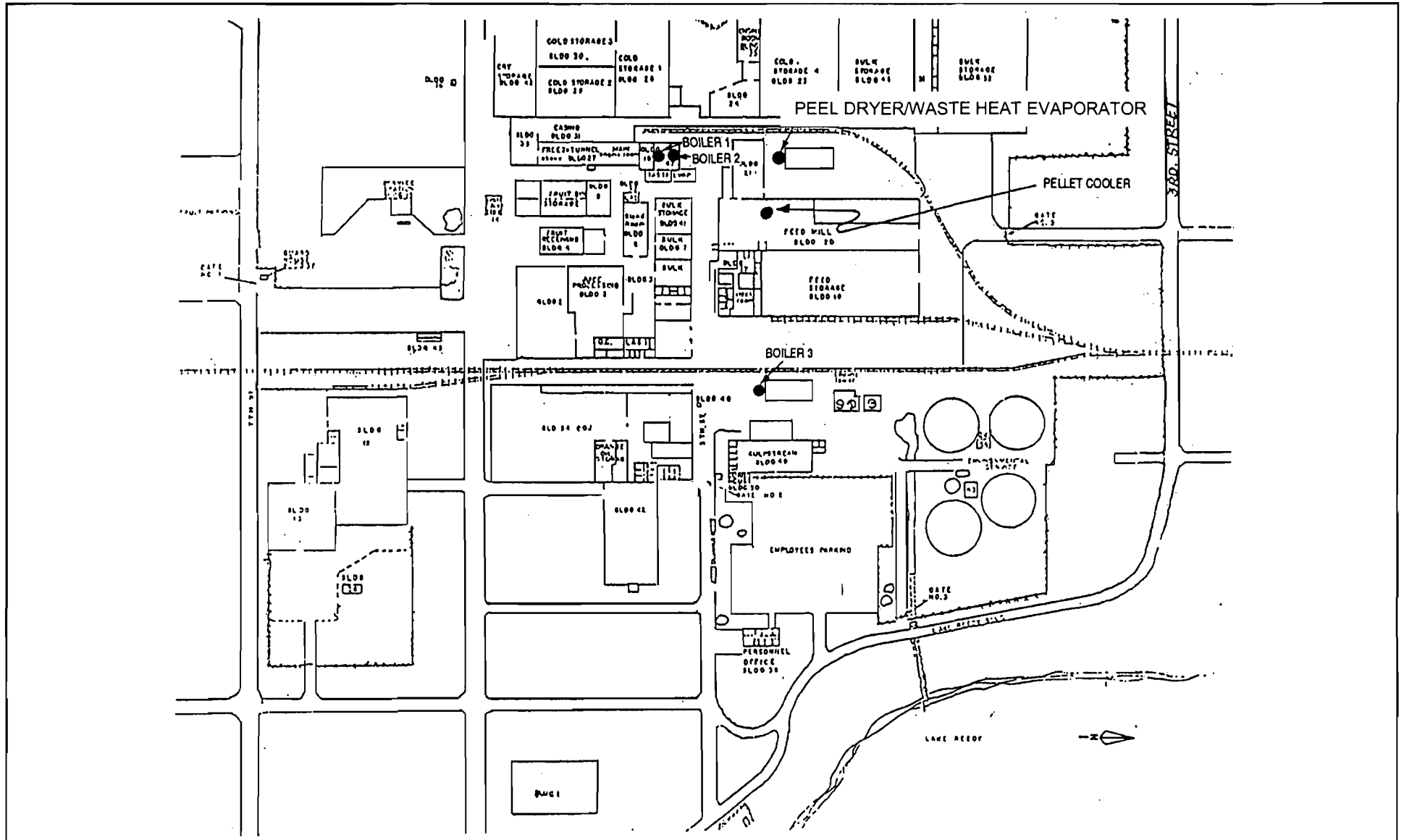
ATTACHMENT CC-FI-C2

FACILITY PLOT PLAN

Best Available Copy

10/16/02

0137544\44.4\4.4.1 Frostproof\CC-FI-C2.doc

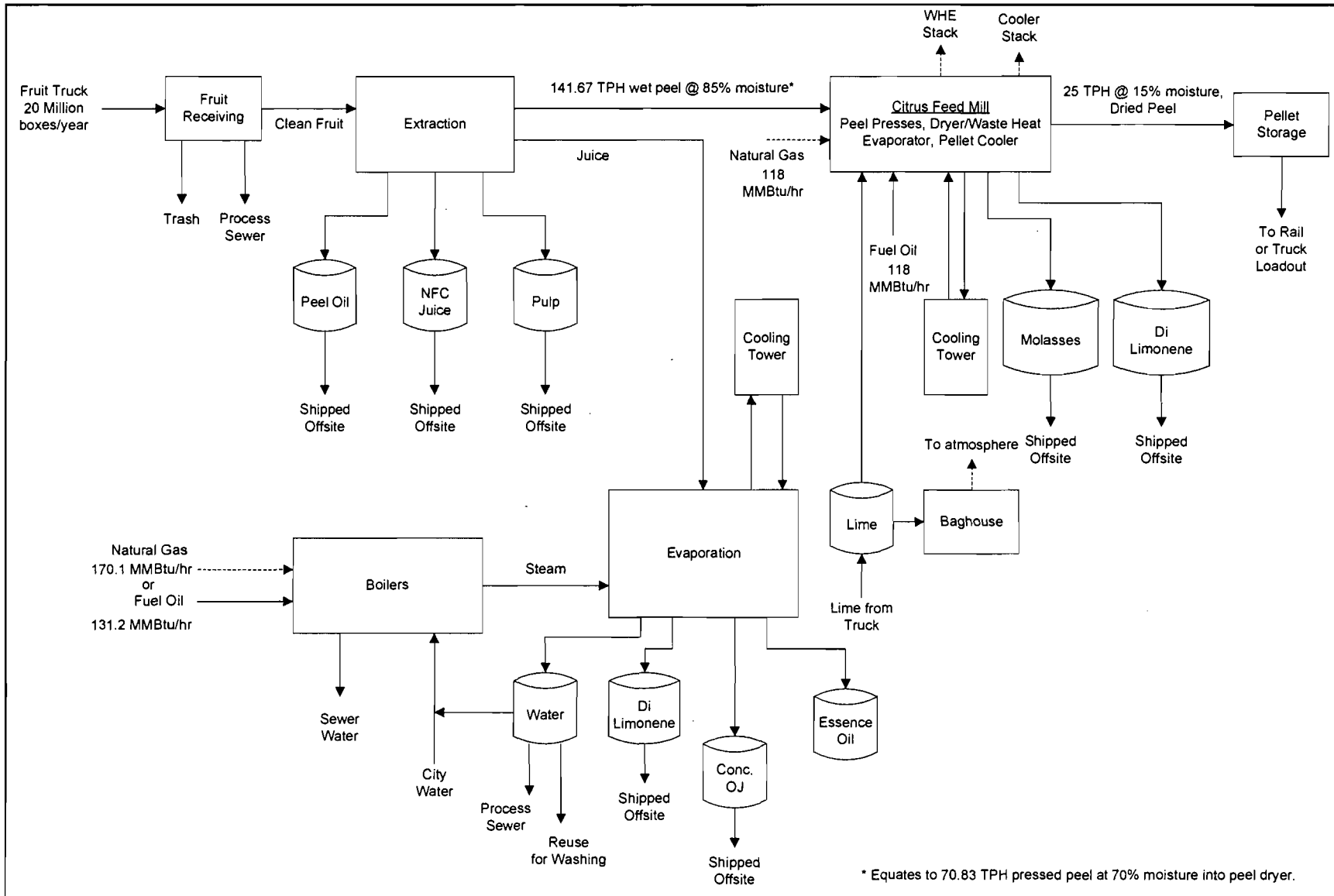


Attachment CC-FI-C2
Stack Locations for Sources at the Cargill Citro Pure, L.P. - Frostproof Facility



ATTACHMENT CC-FI-C3

PROCESS FLOW DIAGRAM



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

Process Flow Legend

- Solid/Liquid ———→
- Gas - - - - -→
- Steam - - - - -→

Emission Unit: Facility

Filename: 0137544\4.4\4.1 Frostproof\FLOWS.VSD

Date: 10/16/02



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)			
<input checked="" type="checkbox"/> 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).			
<input type="checkbox"/> 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.			
<input type="checkbox"/> 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)			
<input checked="" type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.			
<input type="checkbox"/> 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):			
No. 1 Citrus Peel Dryer/Waste Heat Evaporator			
4. Emissions Unit Identification Number: <input type="checkbox"/> No ID			
ID: 001 <input type="checkbox"/> ID Unknown			
5. Emissions Unit Status Code:	6. Initial Startup Date:	7. Emissions Unit Major Group SIC Code:	8. Acid Rain Unit? <input type="checkbox"/>
A		20	
9. Emissions Unit Comment: (Limit to 500 Characters)			
The Citrus Peel Dryer gases discharge into the waste heat evaporator. There is only one stack for the emission unit.			

Emissions Unit Control Equipment

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

High efficiency cyclones (integral to process)

Wet Scrubber

2. Control Device or Method Code(s): **007, 002**

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:	118	mmBtu/hr
2. Maximum Incineration Rate:	lb/hr	tons/day
3. Maximum Process or Throughput Rate:	70.83	TPH
4. Maximum Production Rate:	25.0	TPH
5. Requested Maximum Operating Schedule:	24 hours/day	7 days/week
	32 weeks/year	5,376 hours/year
6. Operating Capacity/Schedule Comment (limit to 200 characters):		
<p>Max Process Rate unit: TPH of pressed peel @ 70% moisture. Max Production Rate unit: TPH of dried peel @ 15% moisture.</p>		

**C. EMISSIONS UNIT REGULATIONS
(Regulated Emissions Units Only)**

List of Applicable Regulations

Rule 62-296.320(4)(a), F.A.C. – Process Weight Table	
Rule 62-296.320(4)(b)(1), F.A.C. – General Visible Emissions Standards	
Rule 62-297.310, F.A.C. – General Compliance Test Requirements	
Rule 62-297.401(1)(a), F.A.C. – EPA Test Method 1	
Rule 62-297.401(2), F.A.C. – EPA Test Method 2	
Rule 62-297.401(4), F.A.C. – EPA Test Method 4	
Rule 62-297.401(5), F.A.C. – EPA Test Method 5	
Rule 62-297.401(9), F.A.C. – EPA Test Method 9	
Rule 62-297.440(1), F.A.C. – Supplemental Test Procedures	

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? Dryer/Waste Heat Evp		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: 76 feet	7. Exit Diameter: 5.67 feet	
8. Exit Temperature: 157 °F	9. Actual Volumetric Flow Rate: 36,000 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 3

1. Segment Description (Process/Fuel Type) (limit to 500 characters): Food and agricultural fuel fired equipment; process heaters; distillate oil.		
2. Source Classification Code (SCC): 3-02-900-01		3. SCC Units: Thousand Gallons burned
4. Maximum Hourly Rate: 0.8429	5. Maximum Annual Rate: 4,531.4	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur: 0.3	8. Maximum % Ash:	9. Million Btu per SCC Unit: 140
10. Segment Comment (limit to 200 characters): Hourly and annual rate represents maximum allowed in permit AC53-243272.		

Segment Description and Rate: Segment 2 of 3

1. Segment Description (Process/Fuel Type) (limit to 500 characters): Food and agricultural fired equipment; process heaters; natural gas.		
2. Source Classification Code (SCC): 3-02-900-03		3. SCC Units: Million Cubic Feet Burned
4. Maximum Hourly Rate: 0.118	5. Maximum Annual Rate: 634.4	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): Hourly and annual rate represent maximum allowed in permit AC53-243272.		

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

Segment Description and Rate: Segment 3 of 3

1. Segment Description (Process/Fuel Type) (limit to 500 characters): Food and agriculture; citrate feed manufacture; drying.		
2. Source Classification Code (SCC): 3-02-008-34		3. SCC Units: Tons of Product
4. Maximum Hourly Rate: 25	5. Maximum Annual Rate: 134,400	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment (limit to 200 characters): Hourly and annual rates refer to dried citrus peel at 15% moisture.		

Segment Description and Rate: Segment ___ of ___

1. Segment Description (Process/Fuel Type) (limit to 500 characters):		
2. Source Classification Code (SCC):		3. SCC Units:
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
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	007	002	EL
PM ₁₀	007	002	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: 34.2 lb/hour 92.0 tons/year		4. Synthetically Limited? [<input checked="" type="checkbox"/>]	
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 _____ to _____ tons/year			
6. Emission Factor: 34.2 lb/hour Reference: Process Weight Table, Rule 62-296.320(4)(a), F.A.C.		7. Emissions Method Code: 0	
8. Calculation of Emissions (limit to 600 characters): $E = 17.31P^{0.16} = 17.31 \times 70.83^{0.16} = 34.2 \text{ lb/hour}$ $34.2 \text{ lb/hour} \times 5,376 \text{ hour/year} \div 2,000 \text{ lb/tons} = 92.0 \text{ tons/year}$			
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):			

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: RULE		2. Future Effective Date of Allowable Emissions:	
3. Requested Allowable Emissions and Units: 34.2 lb/hour		4. Equivalent Allowable Emissions: 34.2 lb/hour 92.0 tons/year	
5. Method of Compliance (limit to 60 characters): Annual stack test using EPA Method 5			
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): Based on Process Weight Table [Rule 62-296.320(4)(a), F.A.C.].			

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

Potential/Fugitive Emissions

1. Pollutant Emitted: SO₂	2. Total Percent Efficiency of Control:
3. Potential Emissions: 35.9 lb/hour 96.5 tons/year	4. Synthetically Limited? [<input checked="" type="checkbox"/>]
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 _____ to _____ tons/year	
6. Emission Factor: 142 S lb/10³ gal Reference: AP-42, Table 1.3-1 (9/98)	7. Emissions Method Code: 3
8. Calculation of Emissions (limit to 600 characters): S = sulfur content of fuel 142 x 0.3 x 0.8429 10³ gal/hour = 35.9 lb/hour 35.9 lb/hour x 5,376 hour/year ÷ 2,000 lb/tons = 96.5 tons/year	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): Based on limit of 0.3% sulfur content in the fuel oil.	

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: 0.3 % Sulfur	4. Equivalent Allowable Emissions: 35.9 lb/hour 96.5 tons/year
5. Method of Compliance (limit to 60 characters): A fuel oil analysis furnished by vendor or Cargill Citro	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): Permit No. AC53-243272	

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: <input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other
3. Requested Allowable Opacity: Normal Conditions: 20 % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance: Annual Stack testing using EPA Method 9	
5. Visible Emissions Comment (limit to 200 characters): Rule 62-296.320(4)(b)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:	<input type="checkbox"/> Rule <input type="checkbox"/> 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**

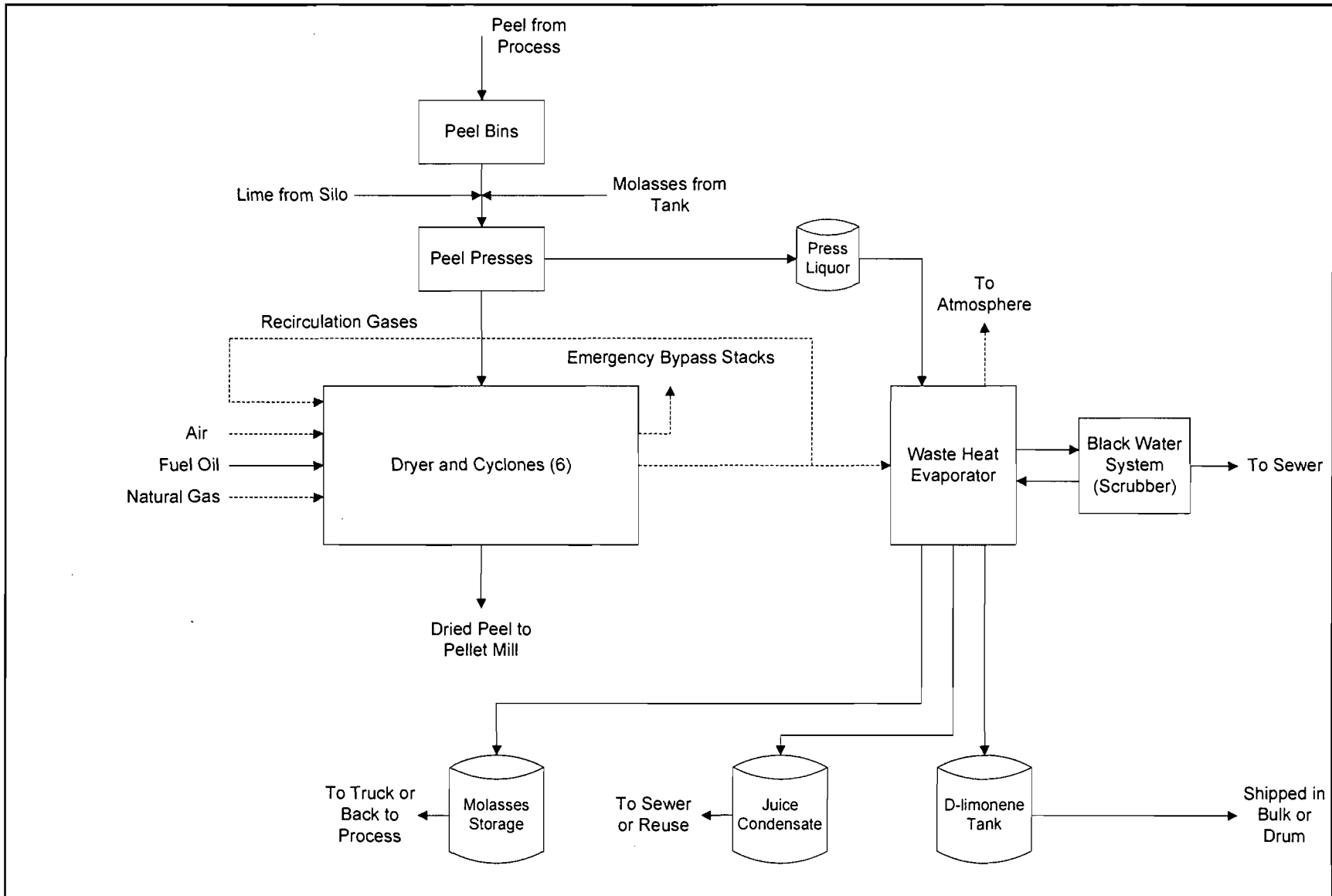
1. Process Flow Diagram <input checked="" type="checkbox"/> Attached, Document ID: <u>CC-EU1-J1</u> <input type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
2. Fuel Analysis or Specification <input checked="" type="checkbox"/> Attached, Document ID: <u>CC-EU1-J2</u> <input type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
3. Detailed Description of Control Equipment <input checked="" type="checkbox"/> Attached, Document ID: <u>CC-EU1-J3</u> <input type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
4. Description of Stack Sampling Facilities <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
5. Compliance Test Report <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously submitted, Date: _____ <input checked="" type="checkbox"/> Not Applicable
6. Procedures for Startup and Shutdown <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
7. Operation and Maintenance Plan <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
8. Supplemental Information for Construction Permit Application <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
9. Other Information Required by Rule or Statute <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
10. Supplemental Requirements Comment:

Additional Supplemental Requirements for Title V Air Operation Permit Applications

11. Alternative Methods of Operation [X] Attached, Document ID: <u>CC-EU1-J11</u> [X] Not Applicable
12. Alternative Modes of Operation (Emissions Trading) [] Attached, Document ID: _____ [X] Not Applicable
13. Identification of Additional Applicable Requirements [X] Attached, Document ID: <u>CC-EU1-J13</u> [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-J1

PROCESS FLOW DIAGRAM



Attachment CC-EU1-J1
 Cargill Citro-America, Inc.
 Process Flow Diagram
 Frostproof, Florida

Process Flow Legend

- Solid/Liquid
- Gas
- Steam

Emission Unit: Dryers/Waste Heat Evaporator

Filename: 0137544\44.44.4.1 Frostproof\FLOWS.VSD

Date: 10/16/02



ATTACHMENT CC-EU1-J2

FUEL ANALYSIS OR SPECIFICATION

ATTACHMENT CC-EU1-J2
FUEL ANALYSIS OR SPECIFICATION

Fuel Analysis Specification for Cargill Citro-America, Inc. Peel Dryer/Evaporator

Parameter	No. 2 Fuel Oil	Natural Gas
Density (lb/gal)	7.2	NA
Heating Value (Btu/gal) or (Btu/scf)	140,000	1,000
Nitrogen (%)	0.01	NA
Sulfur (%)	0.3 Max	NA
Ash/Inorganic (%)	< 0.05	NA

ATTACHMENT CC-EU1-J3

DETAILED DESCRIPTION OF CONTROL EQUIPMENT

ATTACHMENT CC-EU1-J3
CARGILL CITRO-AMERICA INC.
DETAILED DESCRIPTION OF CONTROL EQUIPMENT

Particulate Emissions from the peel dryer are controlled by two devices:

- The first of these is a six-set cyclone system on the discharge of the dryer. On the top of each cyclone is an electrically driven fan which pulls the air flow from the dryer and discharges it to the waste heat evaporator (WHE) or back to the dryer furnace in a 50/50 split. The cyclone and fan system were manufactured by Cook Machinery Inc. Each cyclone/fan assembly is rated to handle 20,000 acfm.
- The second control device is the hot gas sections of the WHE. The hot, moisture-laden gas from the peel dryer is split into two flows. Half is returned to the dryer furnace and half goes to the WHE. The hot gas sections of the WHE consist of three tube and shell exchangers in a vertical configuration. Hot flue gas enters the bottom of the first section, travels up and out into the top of the second section, travels down to the bottom of the second section, up the third section, and then out through the WHE fan and out the stack. The hot gas is on the shell side of these heat exchangers and is cooled and condensed by exchanging its heat with press liquor traveling through the tube side of the heat exchanger. The condensed vapor is collected in the bottom of each section and is called black water. The black water is distributed to two pumps and is re-circulated back to spray nozzles located at the top of each hot gas section. A continuous discharge of black water is sent to the process wastewater system in an amount equal to that being condensed and collected from the dryer gas. At maximum rates, the flow of re-circulated water is 600 gpm. The black water is passed through a series of heat exchangers that preheat the press liquor before the black water is sprayed into the tops of each section. Historical stack data show that the dryer cyclones and the black water process scrubber have a control efficiency sufficient to meet the applicable PM emission limitations.

ATTACHMENT CC-EU1-J11

ALTERNATIVE METHODS OF OPERATION

ATTACHMENT CC-EU1-J11
ALTERNATIVE METHODS OF OPERATION

The peel dryer can operate either on natural gas at up to 118,000 scf/hr (118 MMBtu/hr) or on No. 2 fuel oil at up to 849.9 gal/hr (118 MMBtu/hr).

ATTACHMENT CC-EU1-J13

IDENTIFICATION OF ADDITIONAL APPLICABLE REQUIREMENTS



Lawton Chiles
Governor

Florida Department of Environmental Protection

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619
813-744-6190

Virginia B. Wetherell
Secretary

NOTICE OF PERMIT

In the matter of an
Application for Permit by:

DER File No.: AC53-243272
County: Polk

Mr. A. Francisco Gomes, Plant Manager
Cargill Citro-America, Inc.
P.O. Box 37
Frostproof, FL 33843-0037

Enclosed is Permit Number AC53-243272 for the modification of the operations of the Citrus Peel Dryer and Pellet Cooler, issued pursuant to Section 403.087, Florida Statutes.

Any party to this Order (permit) has the right to seek judicial review of the permit pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400; 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 from the date this Notice is filed with the Clerk of the Department.

Executed in Tampa, Florida.

Sincerely,

David Zell
Air Permit Engineer

DRZ/
enclosure

Copy furnished to:
David A. Buff, P.E., KBN Engineering and Applied Sciences, Inc.

Cargill Citro-America, Inc.

Page Two

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF PERMIT and all copies were mailed before the close of business on MAR 09 1994 to the listed persons.

Clerk Stamp

FILING AND ACKNOWLEDGEMENT FILED,
on this date, pursuant to Section
120.52(9), Florida Statutes, with the
designated Department Clerk, receipt
of which is hereby acknowledged.

Marlynn Quince
Clerk,

MAR 09 1994

(Date)

BEST AVAILABLE COPY

Florida Department of
Environmental Protection



Lawton Chiles
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619
813-793-6100

Virginia B. Wetherell
Secretary

PERMITTEE:

Cargill Citro-America, Inc.
P.O. Box 37
Frostproof, FL 33843-0037

PERMIT/PROJECT:

Permit No: AC53-243272
County: Polk
Expiration Date: 01/31/95
Project: Citrus Peel Dryer and
Pellet Cooler
(Operational Modifications)

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 17-200 through 297, and Chapter 17-4. 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 department and made a part hereof and specifically described as follows:

For the modification of the operational limitations of the citrus peel dryer and pellet cooler. These modifications consist of changes to the permitted process rates, heat input rate (peel dryer), fuel oil sulfur content (peel dryer) and hours of operation.

As modified the citrus peel dryer will be fired on natural gas or No. 2 (distillate) fuel oil with a maximum sulfur content of 0.3% by weight, at a maximum heat input rate of 118 MMBtu/hour (corresponds to 118 MCF/hour of natural gas or 842.9 gallons/hour of No. 2 oil @ 140,000 Btu/gallon). The maximum process material input rate will be 141,667 pounds/hour (70.8 tons/hour) of pressed peel (at approximately 70% moisture), with a maximum production rate of 50,000 pounds/hour (25 tons/hour) of dried peel (at approximately 15% moisture). Exhaust gas from the dryer is first passed through high efficiency cyclones to remove particulate matter, and then goes to a waste heat evaporator and through a scrubber before being finally exhausted to the atmosphere through a 76 foot tall stack.

As modified the Sprout-Bauer, Inc. Model DP74CS, horizontal double-pass pellet cooler will have a maximum process input rate of 50,000 pounds/hour (25 tons/hour) of dried peel (from the peel dryer) and a maximum production rate of 50,000 pounds/hour (25 tons/hour) of pellets. Particulate emissions from the pellet cooler are controlled by five (5) MAC Equipment, Inc. Model HE43 hi-efficiency dry cyclone collectors.

ALL JUICE

ID: 813-635-8130
America, Inc.

Frostproof, FL

PERMIT/PROJECT:

Permit No. : AC53-243272

Project: Citrus Peel Dryer &
Pellet Cooler

Description (continued):

Location: 5th Street and U.S. Alternate Highway 27 in Frostproof

UTM: 17-448.0 E 3068.5 N

NEDS No: 0019

Point ID No:

Peel Dryer - 01

Pellet Cooler - 06

Replaces Permit Nos.: AC53-125508 (Citrus Peel Dryer)
AC53-201072 (Pellet Cooler)

Modifies Permit Nos.: A053-175728 (Citrus Peel Dryer)
A053-216260 (Pellet Cooler)

Specific Conditions:

1. A part of this permit is the attached 15 General Conditions.
[Rule 17-4.160, F.A.C.]

2. Issuance of this permit does not relieve the permittee from complying with applicable emission limiting standards or other requirements of Chapters 17-200 through 17-297, or any other requirements under federal, state or local law.
[Rule 17-210.300, F.A.C.]

Operation and Emission Limitations

3. The hours of operation of the citrus peel dryer shall not exceed 5,376 hours per 12 consecutive month period.
[Construction permit application]

4. The hours of operation of the pellet cooler shall not exceed 5,376 hours per 12 consecutive month period.
[Construction permit application]

5. The maximum process input rate to the citrus peel dryer shall not exceed 141,667 pound per hour (70.83 tons per hour) of pressed Peel.
[Construction permit application]

6. The maximum process input rate to the pellet cooler shall not exceed 50,000 pound per hour (25.0 tons per hour) of dried peel.
[Construction permit application]

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PERMITTEE:

Cargill Citro-America, Inc.
Frostproof, FL

PERMIT/PROJECT:

Permit No. : AC53-243272
Project: Citrus Peel Dryer &
Pellet Cooler

Specific Conditions:

7. The citrus peel dryer shall be fired only with natural gas or new No. 2 (distillate) fuel oil with a sulfur content not to exceed 0.3% S by weight. No used or recycled oil shall be fired. The maximum fuel firing rate shall not exceed 118 MCF/hour of natural gas or 842.9 gallons/hour of No. 2 fuel oil (corresponds to a maximum heat input rate of 118 MMBtu/hr).

[Construction permit application]

8. The maximum allowable emission rate of particulate matter from the citrus peel dryer/waste heat evaporator stack for the maximum process input rate of 141,677 pounds per hour (70.83 tons/hour) is 34.2 pounds per hour as set by the Process Weight Table contained within Rule 17-296.310(1), F.A.C. At lesser process input rates the allowable emission rates can be determined from the appropriate equation. In combination with the hourly limitation contained in Specific Condition No. 3, this results in a maximum allowable annual particulate matter emissions of 92.0 tons per year.

[Rule 17-296.310(1), F.A.C.]

9. The maximum allowable emission rate of particulate matter from the pellet cooler for the maximum process input rate of 50,000 pounds per hour (25.0 tons per hour) of dried peel is 26.4 pounds per hour as set by the Process Weight Table contained within Rule 17-296.310(1), F.A.C. At lesser process input rates the allowable emission rates can be determined from the appropriate equation. In combination with the hourly limitation contained in Specific Condition No. 4, this results in a maximum allowable annual particulate matter emissions of 71.0 tons per year.

[Rule 17-296.310(1), F.A.C.]

10. Visible emissions from the peel dryer/waste heat evaporator stack shall not be equal to or greater than 20% opacity.

[Rule 17-296.310(2)(a), F.A.C.]

11. Visible emissions from the pellet cooler stack shall not be equal to or greater than 20% opacity.

[Rule 17-296.310(2)(a), F.A.C.]

12. All reasonable precautions shall be taken to prevent and control generation of unconfined emissions of particulate matter in accordance with the provisions in Rule 17-296.310(3)(c), F.A.C. These provisions are applicable to any source, including but not limited to, vehicular movement, transportation of materials, construction, alteration, demolition or wrecking, or industrial related activities such as loading, unloading, storing and handling.

[Rule 17-296.310(3)(b), F.A.C.]

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PERMITTEE:

Cargill Citro-America, Inc.
Frostproof, FL

PERMIT/PROJECT:

Permit No. : AC53-243272
Project: Citrus Peel Dryer &
Pellet Cooler

Specific Conditions:

13. The permittee shall not cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor.
[Rule 17-296.320(2), F.A.C.]

Compliance Testing Requirements

14. The citrus peel dryer/waste heat evaporator exhaust shall be tested for the following within 30 days after the peel dryer is first placed in operation at a process input rate greater than 92,000 pounds/hour (46 tons/hour) of pressed peel:

- (X) Particulate matter (PM)
- (X) Visible emissions (VE)

A test report shall be submitted within 45 days of testing to the Air Program of the Southwest District Office of the Department in conjunction with a Certificate of Completion of Construction.
[Rules 17-297.340(1)(a), and 17-297.450, F.A.C.]

15. The pellet cooler cyclone exhaust stack shall be tested for the following within 30 days after the pellet cooler is first placed in operation at a process input rate greater than 32,000 pounds/hour (16 tons/hour) of dried peel:

- (X) visible emissions (VE)
- (X) particulate matter (PM)

A test report shall be submitted within 45 days of testing to the Air Program of the Southwest District Office of the Department in conjunction with a Certificate of Completion of Construction.
[Rules 17-297.340(1)(a), and 17-297.450, F.A.C.]

16. Compliance with the limitations of Specific Condition Nos. 8, 9, 10, and 11 shall be determined using EPA Methods 1, 2, 4, 5 and 9 contained in 40 CFR 60, Appendix A and adopted by reference in Rule 17-297, F.A.C. The minimum requirements for stationary point source emission test procedures and reporting shall be in accordance with Rule 17-297.00, F.A.C. and 40 CFR 60 Appendix A.
[Rule 17-297.330, F.A.C.]

17. The visible emissions tests shall be conducted by a certified observer and be a minimum of sixty (60) minutes in duration. The test observation period shall be during one of the runs of the particulate test and shall include the period during which the highest opacity emissions can reasonably be expected to occur.
[Rule 17-297.330, F.A.C.]

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PERMITTEE:

Cargill Citro-America, Inc.
Frostproof, FL

PERMIT/PROJECT:

Permit No. : AC53-243272
Project: Citrus Peel Dryer &
Pellet Cooler

Specific Conditions:

18. Testing of emissions from the citrus peel dryer shall be conducted during operation at 90-100% of the maximum permitted pressed peel process input rate of 141,667 pounds per hour (70.83 tons per hour) and 90-100% of the maximum fuel firing rate (118 MMBtu/hr). Testing may be performed using natural gas or No. 2 fuel oil. If testing is performed using natural gas, and No. 2 fuel oil is subsequently fired in the citrus peel dryer, then testing shall be conducted using No. 2 fuel oil within 30 days of initially firing fuel oil in the citrus peel dryer. Testing at a rate less than 90% of the maximum permitted rates will result in an operation permit being issued for the lower tested operating rates plus 10%. In order to receive approval for higher operating rates (never to exceed 141,667 pounds per hour nor 118 MMBtu/hour), it will be necessary to conduct additional compliance tests at the higher rates. A statement of the peel dryer pressed peel process input rate and the fuel type and firing rate shall be included with any test reports. Failure to submit the operating rates, or operating under conditions that are not representative of normal operation, may invalidate the test and fail to provide reasonable assurance of compliance.

[Rule 17-4.070(3), F.A.C.]

19. Testing of emissions from the pellet cooler must be conducted during operation at 90-100% of the maximum permitted dried peel process input rate of 50,000 pounds per hour (25.0 tons per hour). Testing at a rate less than 90% of the maximum permitted process rate will result in an operation permit being issued for the lower tested rate plus 10%. In order to receive approval for a higher process rate (never to exceed 50,000 pounds per hour), it will be necessary to conduct additional compliance tests at the higher rates. A statement of the dried peel process input rate shall be included with any test reports. Failure to submit the process input rate, or operating under conditions that are not representative of normal operation, may invalidate the test and fail to provide reasonable assurance of compliance.

[Rule 17-4.070(3), F.A.C.]

20. The permittee shall notify the Air Program of the Southwest District Office of the Department at least 15 days prior to the date on which each formal compliance test is to begin of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted.

[Rule 17-297.340(1)(i), F.A.C.]

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PERMITTEE:

Cargill Citro-America, Inc.
Frostproof, FL

PERMIT/PROJECT:

Permit No. : AC53-243272
Project: Citrus Peel Dryer &
Pellet Cooler

Specific Conditions:

21. Compliance with the fuel oil sulfur content limitation of Specific Condition No. 7 shall be demonstrated during the citrus peel dryer PM and VE tests by either of the following:

- A. A Certificate of Fuel Oil Analysis (including sulfur content by weight) from your fuel oil vendor for the fuel oil used during the compliance test shall be submitted in conjunction with the test report.
- B. A Certificate of Fuel Oil Analysis (including sulfur content by weight) for a fuel oil sample taken during the compliance test shall be submitted in conjunction with the test report.

[Rule 17-4.070(3), F.A.C.]

Recordkeeping Requirements

22. In order to document continuing compliance with Specific Condition No. 7, records of the sulfur content, in % by weight, of the No. 2 fuel oil used in the citrus peel dryer shall be kept, based on either vendor provided as-shipped analysis, or on analysis of as-received samples taken at the plant. Records shall also be kept of monthly and annual No. 2 fuel oil use (in gallons). The above records shall be maintained for a minimum of two years and made available to the Department upon request.

[Rule 17-4.070(3), F.A.C.]

23. In order to document compliance with the operating hour limitations of Specific Condition Nos. 3 and 4, the permittee shall maintain a record of daily citrus peel dryer and pellet cooler operating hours. (The citrus peel dryer is considered in operation any time that fuel is being fired regardless of whether pressed peel is being processed.) The records shall also include a summary of total operating hours for each month and the most recent 12 consecutive month period. These records shall be recorded in a permanent form suitable for inspection by the Department upon request, and shall be retained for at least the most recent two year period. [Rule 17-4.070(3), F.A.C.]

24. The permittee shall keep a log of citrus peel dryer scrubber operating parameters. These scrubber operating parameters could include scrubber water spray rate (gallons/minute), water spray pressure, pressure drop across scrubber or other parameters that are used to control and monitor the operation of the spray scrubber. A copy of the scrubber operation log sheet for the day of any compliance test shall be submitted to the Department with the test report. [Rule 17-4.070(3), F.A.C.]

BEST AVAILABLE COPY

PERMITTEE:

Cargill Citro-America, Inc.
Frostproof, FL

PERMIT/PROJECT:

Permit No. : AC53-243272
Project: Citrus Peel Dryer &
Pellet Cooler

Specific Conditions:

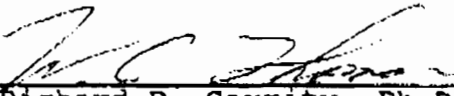
Permit Application

25. Two applications for operation permit amendments shall be submitted to the Air Program of the Southwest District Office of the Department within 45 days of testing or at least 60 days prior to the expiration date of this permit, whichever occurs first. To properly apply for an operation permit, the applicant shall submit the following:

- A. the appropriate application form (Certificate of Completion of Construction) noting any deviations from the construction permit application (no permit amendment fee is required since this is a Title V facility);
- B. the compliance test reports and information as required by Specific Condition Nos. 14 and 15 of this permit;
- C. a copy of the fuel oil and operating hour records (Specific Condition Nos. 22 and 23) for the most recent calendar month;
- D. a copy of the citrus peel dryer scrubber operation logs (Specific Condition No. 24) for the most recent calendar month.

Upon complete submission of the above, the current operation permits for the citrus peel dryer (A053-175728) and the pellet cooler (A053-216260) will be amended to incorporate the limitations and conditions of this construction permit. [Rules 17-4.070(3) and 17-297.340(1)(a), F.A.C.]

FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION


Richard D. Garrity, Ph.D.
Director of District Management
Southwest District

ATTACHMENT - GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.141, 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.
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, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
3. As provided in Subsections 403.087(6) and 403.722(5), F.S., the issuance of this permit does not convey any 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 of 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.
4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgement 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.
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.
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.
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:

BEST AVAILABLE COPY

GENERAL CONDITIONS:

- a. Have access to and copy any 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.

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.

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.

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, F.S. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

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.

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 17-4.120 and 17-730.300, 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.

GENERAL CONDITIONS:

12. This permit or a copy thereof shall be kept at the work site of the permitted activity.

13. This permit also constitutes:

- () Determination of Best Available Control Technology (BACT)
- () Determination of Prevention of Significant Deterioration (PSD)
- () Compliance with New Source Performance Standards (NSPS)

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 for 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:
 - the date, exact place, and time of sampling or measurements;
 - the person responsible for performing the sampling or measurements;
 - the dates analyses were performed;
 - the person responsible for performing the analyses;
 - the analytical techniques or methods used; and
 - the results of such analyses.

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.

Best Available Copy



Department of Environmental Protection

Lawton Chiles
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

Virginia B. Wetherell
Secretary

DEC 22 1994

Mr. A. Francisco Gomes
Plant Manager
Cargill Citro-America, Inc.
Post Office Box 37
Frostproof, FL 33843-0037

Dear Mr. Gomez:

Re: Polk County - AP
AC53-243272
(DEP File 261858)

On December 12, 1994, the Department received from your consultant, Ms. Gail Rampersaud, a request to extend the expiration date of permit AC53-243272. As requested, the expiration date for permit AC53-243272 is hereby changed as follows:

FROM: 1/31/95

TO: 4/30/95

A person whose substantial interests are affected by this permit amendment may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within 14 days of receipt of this Permit. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

The Petition shall contain the following information;

- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;

Mr. A. Francisco Gomes
Cargill Citro-America, Inc.Mr.
AC53-243272

Page Two

- (d) A statement of the material facts disputed by Petitioner, if any;
- (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or
- (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and
- (g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this permit. Persons whose substantial interests will be affected by any decision of the Department with regard to the application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of receipt of this notice in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

This permit amendment is final and effective on the date filed with the Clerk of the Department unless a petition is filed in accordance with the above paragraphs or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition and conforms to Rule 17-103.070, F.A.C. Upon timely filing of a petition or a request for an extension of time this permit amendment will not be effective until further Order of the Department.

When the Order (Permit Amendment) is final, any party to the Order has the right to seek judicial review of the Order pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate procedure, with the Clerk of the Department in the Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate

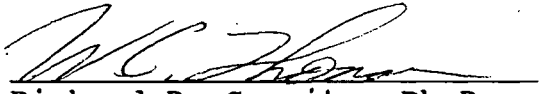
Mr. A. Francisco Gomes
Cargill Citro-America, Inc. Mr.
AC53-243272

Page Three

District Court of Appeal. The Notice of Appeal must be filed within 30 days from the date the Final Order is filed with the Clerk of the Department.

This letter must be attached to and becomes a part of permit AC53-243272. If you have any questions, please call Bill Schroeder of my staff at (813) 744-6100 extension 112.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION


For Richard D. Garrity, Ph.D.
Director of District Management

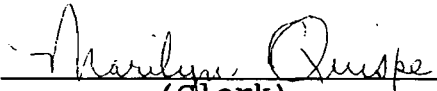
cc: Gail Rampersaud, KBN Engineering & Applied Sciences, Inc.

CERTIFICATE OF SERVICE

This is to certify that this NOTICE OF PERMIT AMENDMENT and all copies were mailed by certified mail before the close of business on DEC 22 1994 to the listed persons.

Clerk Stamp

FILING AND ACKNOWLEDGEMENT FILED,
on this date, pursuant to Section
120.52(11), Florida Statutes, with
the designated Department Clerk,
receipt of which is hereby acknowledge.


(Clerk) DEC 22 1994
(Date)

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)			
<input checked="" type="checkbox"/> 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).			
<input type="checkbox"/> 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.			
<input type="checkbox"/> 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)			
<input checked="" type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.			
<input type="checkbox"/> 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):			
Pellet Cooler			
4. Emissions Unit Identification Number: [] No ID			
ID: 006 [] 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)			

Emissions Unit Control Equipment

<p>1. Control Equipment/Method Description (Limit to 200 characters per device or method):</p> <p style="margin-left: 40px;">Cyclones are an integral part of the process and not considered as control equipment</p>
<p>2. Control Device or Method Code(s):</p>

Emissions Unit Details

<p>1. Package Unit:</p> <table style="width: 100%; border: none;"> <tr> <td style="width: 50%; border: none;">Manufacturer:</td> <td style="width: 50%; border: none;">Model Number:</td> </tr> </table>	Manufacturer:	Model Number:				
Manufacturer:	Model Number:					
<table style="width: 100%; border: none;"> <tr> <td style="width: 50%; border: none;">2. Generator Nameplate Rating:</td> <td style="width: 50%; border: none;">MW</td> </tr> </table>	2. Generator Nameplate Rating:	MW				
2. Generator Nameplate Rating:	MW					
<p>3. Incinerator Information:</p> <table style="width: 100%; border: none;"> <tr> <td style="width: 60%; border: none;">Dwell Temperature:</td> <td style="width: 40%; border: none;">°F</td> </tr> <tr> <td style="border: none;">Dwell Time:</td> <td style="border: none;">seconds</td> </tr> <tr> <td style="border: none;">Incinerator Afterburner Temperature:</td> <td style="border: none;">°F</td> </tr> </table>	Dwell Temperature:	°F	Dwell Time:	seconds	Incinerator Afterburner Temperature:	°F
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:		mmBtu/hr
2. Maximum Incineration Rate:	lb/hr	tons/day
3. Maximum Process or Throughput Rate:		
4. Maximum Production Rate:		25.0 TPH
5. Requested Maximum Operating Schedule:		
	24 hours/day	7 days/week
	32 weeks/year	5,376 hours/year
6. Operating Capacity/Schedule Comment (limit to 200 characters):		
	Maximum rate relates to dried citrus peel at 15% moisture.	

**C. EMISSIONS UNIT REGULATIONS
(Regulated Emissions Units Only)**

List of Applicable Regulations

Rule 62-296.320(4)(a), F.A.C. – Process Weight Table	
Rule 62-296.320(4)(b), F.A.C. – General Visible Emission Standards	
Rule 62-297.310, F.A.C. – General Compliance Test Requirements	
Rule 62-297.401(a), F.A.C. – EPA 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? Pellet Cooler		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: H	6. Stack Height: 42 feet	7. Exit Diameter: 4.3 feet	
8. Exit Temperature: 110 °F	9. Actual Volumetric Flow Rate: 27,700 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): Stack data based on 1/13/95 stack test. Stack outlet dimensions are 3.3 feet by 4.3 feet.			

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

Segment Description and Rate: Segment 1 of 1

1. Segment Description (Process/Fuel Type) (limit to 500 characters): Food and agriculture; feed manufacture; pellet cooler.		
2. Source Classification Code (SCC): 3-02-008-16		3. SCC Units: Tons Processed
4. Maximum Hourly Rate: 25	5. Maximum Annual Rate: 134,400	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment (limit to 200 characters): Hourly and annual rates refer to dry citrus peel at 15% moisture.		

Segment Description and Rate: Segment of

1. Segment Description (Process/Fuel Type) (limit to 500 characters):		
2. Source Classification Code (SCC):		3. SCC Units:
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
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			EL
PM ₁₀			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: 26.4 lb/hour		4. Synthetically Limited? <input checked="" type="checkbox"/>	
		71.0 tons/year	
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 _____ to _____ tons/year			
6. Emission Factor: 26.4 lb/hour Reference: Process Weight Table, Rule 62-296.320(4)(a), F.A.C.		7. Emissions Method Code: 0	
8. Calculation of Emissions (limit to 600 characters): $E = 3.59P^{0.62} = 3.59 \times 25.0^{0.62} = 26.4 \text{ lb/hour}$ $26.4 \text{ lb/hour} \times 5,376 \text{ hour/year} \div 2,000 \text{ lb/ton} = 71.0 \text{ tons/year}$			
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):			

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: RULE		2. Future Effective Date of Allowable Emissions:	
3. Requested Allowable Emissions and Units: 26.4 lb/hour		4. Equivalent Allowable Emissions: 26.4 lb/hour 71.0 tons/year	
5. Method of Compliance (limit to 60 characters): EPA Method 9 VE			
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): Process weight table from Rule 62-296.320(4)(a), F.A.C.			

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: [<input checked="" type="checkbox"/>] Rule [<input type="checkbox"/>] Other
3. Requested Allowable Opacity: Normal Conditions: 20 % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance: Annual Stack test using EPA Method 9	
5. Visible Emissions Comment (limit to 200 characters): Rule 62-296.320(4)(b)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:	[<input type="checkbox"/>] Rule [<input type="checkbox"/>] 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**

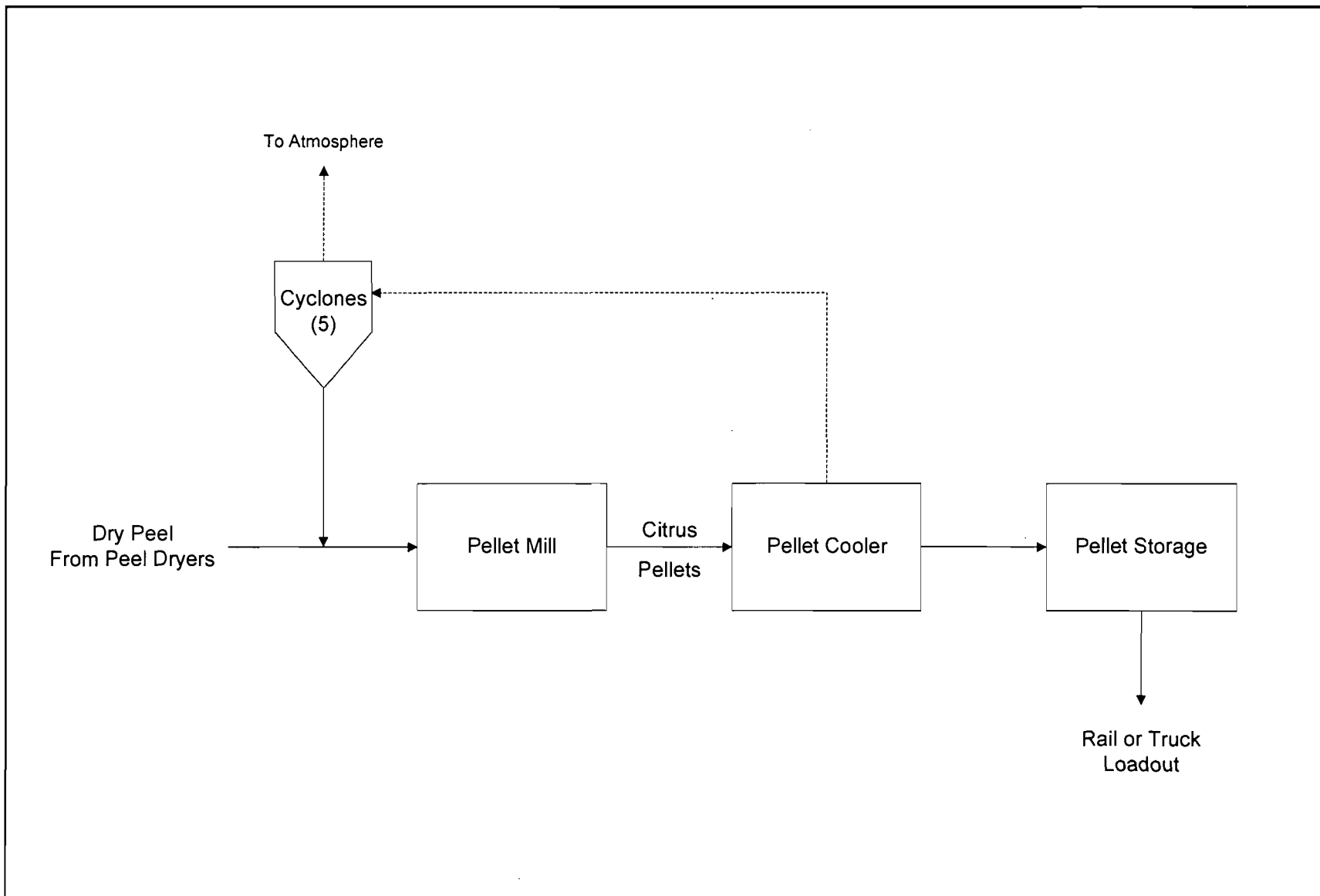
1. Process Flow Diagram <input checked="" type="checkbox"/> Attached, Document ID: <u>CC-EU2-J1</u> <input type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
2. Fuel Analysis or Specification <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
3. Detailed Description of Control Equipment <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
4. Description of Stack Sampling Facilities <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
5. Compliance Test Report <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously submitted, Date: _____ <input checked="" type="checkbox"/> Not Applicable
6. Procedures for Startup and Shutdown <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
7. Operation and Maintenance Plan <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
8. Supplemental Information for Construction Permit Application <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
9. Other Information Required by Rule or Statute <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
10. Supplemental Requirements Comment:

Additional Supplemental Requirements for Title V Air Operation Permit Applications

11. Alternative Methods of Operation <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
12. Alternative Modes of Operation (Emissions Trading) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
13. Identification of Additional Applicable Requirements <input type="checkbox"/> Attached, Document ID: <u>CC-EU1-J13</u> <input checked="" type="checkbox"/> Not Applicable
14. Compliance Assurance Monitoring Plan <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
15. Acid Rain Part Application (Hard-copy Required) <input type="checkbox"/> Acid Rain Part - Phase II (Form No. 62-210.900(1)(a)) Attached, Document ID: _____ <input type="checkbox"/> Repowering Extension Plan (Form No. 62-210.900(1)(a)1.) Attached, Document ID: _____ <input type="checkbox"/> New Unit Exemption (Form No. 62-210.900(1)(a)2.) Attached, Document ID: _____ <input type="checkbox"/> Retired Unit Exemption (Form No. 62-210.900(1)(a)3.) Attached, Document ID: _____ <input type="checkbox"/> Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.) Attached, Document ID: _____ <input type="checkbox"/> Phase NOx Averaging Plan (Form No. 62-210.900(1)(a)5.) Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

ATTACHMENT CC-EU2-J1

PROCESS FLOW DIAGRAM



Attachment CC-EU2-J1
 Cargill Citro-America, Inc.
 Process Flow Diagram
 Frostproof, Florida

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

Emission Unit: Pellet Mill

Filename: 0137544\44.44.4.1 Frostproof\FLOWS.VSD

Date: 10/16/02



ATTACHMENT A

**PROPOSED REVISIONS TO
PERMIT NO. 1050019-003-AV**

Cargill Citro Pure, L.P.
Facility ID No.: 1050019
Polk County

Title V Air Operation Permit Revision

DRAFT Permit No.: 1050019-008-AV
Revision to Title V Air Operation Permit No.: 1050019-003-AV

Revisions are presented in the permit in ~~shaded~~/~~striketrough~~ format with ~~shaded~~ areas indicating the revision and ~~striketrough~~ indicating the previous permit.

Cargill's proposed revisions are presented in the permit in underline/~~striketrough~~ format.
Text in underlined blue font indicating a revision and text in green ~~striketrough~~ indicating the previous permit.

Permitting Authority:

Florida Department of Environmental Protection
Southwest District
3804 Coconut Palm Drive
Tampa, FL 33619
Telephone: 813/744-6100
Fax: 813/744-6458

Title V Air Operation Permit Revision

DRAFT Permit No.: 1050019-008-AV

Revision to Title V Air Operation Permit No.: 1050019-003-AV

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A. Facility Description.	
B. Summary of Emissions Unit ID No(s). and Brief Description(s).	
C. Relevant Documents.	
II. Facility-wide Conditions	4 - 9
III. Emissions Unit(s) and Conditions	
A. 001 Citrus Peel Dryer No. 1	
006 Citrus Pellet Cooler	A1 - A7
B. 004 Boiler No. 1	
005 Boiler No. 2	
007 Boiler No. 3	B1 - B5
IV. Appendices and Attachments (listed in sequence as attached)	
Appendix U-1 List of Unregulated Emission Units and/or Activities.	
Appendix TV-4, Title V Conditions	
Appendix SS-1, Stack Sampling Facilities	
Appendix A-1, Abbreviations, Definitions, Citations, and ID Numbers	
Table 297.310-1 Calibration Schedule	
BACT Determination dated December 13, 1985 for Boiler No. 3*	
BACT Determination dated January 26, 1994 for Boiler Nos. 1 and 2*	
Table 1-1, Summary of Air Pollutant Standards and Terms	
Table 2-1, Summary of Compliance Requirements	

*These attachments are not available as an electronic file, but are available as a hardcopy.

Permittee:
Cargill Citro Pure, L.P.
100 East 6th Street
Frostproof, FL 33843

DRAFT Permit No.: 1050019-008-AV
Facility ID No.: 1050019
SIC Nos.: 20, 2037
Project: Title V Air Operation Permit Revision

This permit revision is being issued for the purpose of incorporating the terms and conditions of the air construction permit, No. 1050019-007-AC, for repairs made to Boiler No. 2 including changes in operational limits. 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-4, TITLE V CONDITIONS (version dated 02/12/02)
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.

Original Effective Date of 1050019-003-AV: June 5, 2000
Effective Date of this Revision, 1050019-008-AV:
Renewal Application Due Date: December 8, 2004
Expiration Date: June 5, 2005

FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION

Gerald J. Kissel, P.E.
Air Permitting Supervisor

/JWW

Section I. Facility Information.

Subsection A. Facility Description.

This facility consists of a citrus processing plant and associated sprayfield. The citrus processing facility consists of one citrus peel dryer, one citrus pellet cooler, three boilers (Nos. 1, 2 and 3), and process equipment (which includes fruit washers, oil and juice extraction equipment, cooling towers, fruit and peel conveyance equipment and peel storage). The spray field, located approximately 5 miles from the citrus plant, is used to dispose of the facility's wastewater.

The facility is a Title V facility, since it has the potential to emit 100 tons per year or more of volatile organic compounds (VOC). The facility is also considered a PSD major facility, since the facility has the potential to emit 250 tons per year or more of VOC's. This permit contains no emission limit for VOC's, since there is no applicable standard.

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

Based on the initial Title V permit application received June 14, 1996, and additional information dated November 15, 1999, this facility is a major source of hazardous air pollutants (HAPs).

BACT Determination dated December 13, 1985, relates to Boiler Nos. 1 and 2. BACT Determination dated January 26, 1994, relates to Boiler No. 3.

The citrus processing plant may receive wet peel from other citrus processing plants.

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

<u>E.U.</u>	
<u>ID No.</u>	<u>Brief Description</u>
-001	Citrus Peel Dryer No. 1
-004	Boiler No. 1
-005	Boiler No. 2
-006	Citrus Pellet Cooler
-007	Boiler No. 3

Unregulated Emissions Units and/or Activities

- 009 Sprayfield
- 010 Facility Wide Unregulated Emissions

Please reference the Permit No., Facility ID No., and appropriate Emissions Unit(s) ID No(s). on all correspondence, test report submittals, applications, etc.

Subsection C. Relevant Documents.

The documents listed below are not a part of this permit; however, they are specifically related to this permitting action.

These documents are provided to the permittee for information purposes only:

- Table 1-1, Summary of Air Pollutant Standards and Terms
- Table 2-1, Summary of Compliance Requirements
- Appendix A-1, Abbreviations, Acronyms, Citations, and Identification Numbers
- Statement of Basis

These documents are on file with permitting authority:

- Initial Title V Permit Application received June 14, 1996
- Additional Information Request dated November 12, 1998
- Additional Information Response received July 15, 1999
- Additional Information dated November 15, 1999
- Letter dated February 2, 2000, requesting change in Boiler Nos. 1 and 2 operating hours.
- Letter dated March 13, 2000, changing the Responsible Official.
- Title V Revision Application received February 6, 2002

Section II. Facility-wide Conditions.

The following conditions apply facility-wide:

1. APPENDIX TV-4, TITLE V CONDITIONS, is a part of this permit.
{Permitting note: APPENDIX TV-4, TITLE V CONDITIONS, is distributed to the permittee only. Other persons requesting copies of these conditions shall be provided one copy when requested or otherwise appropriate.}

2. General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited. The permittee shall not cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor.
[Rule 62-296.320(2), F.A.C.; 1050019-002-AC]

3. General Particulate Emission Limiting Standards. General Visible Emissions Standard. Except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20 percent opacity). EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C.
[Rule 62-296.320(4)(b)1. & 4., F.A.C.]

4. Prevention of Accidental Releases (Section 112(r) of CAA).

a. The permittee shall submit its Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center when, and if, such requirement becomes applicable. Any Risk Management Plans, original submittals, revisions or updates to submittals, should be sent to:

RMP Reporting Center
Post Office Box 3346
Merrifield, VA 22116-3346
Telephone: 703/816-4434

and,

b. The permittee shall submit to the permitting authority Title V certification forms or a compliance schedule in accordance with Rule 62-213.440(2), F.A.C.
[40 CFR 68]

5. Unregulated Emissions Units and/or Activities. Appendix U-1, List of Unregulated Emissions Units and/or Activities, is a part of this permit.
[Rule 62-213.440(1), F.A.C.]

6. General Pollutant Emission Limiting Standards. Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) Emissions. No person shall store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds (VOC) or organic solvents (OS) without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. (Permitting Note: As of the effective date of this Title V permit, no vapor emission control devices or systems have been deemed necessary or ordered by the Department.)
[Rule 62-296.320(1)(a), F.A.C.]

7. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility include: use of a high efficiency baghouse during loading of the lime silo, removal of fugitive dust and particulate matter from roads through the use of a street sweeper as needed, the use of covered conveyors on the material handling systems, maintenance of paved areas as needed, limiting access to plant property from unnecessary vehicles, and enclosed warehouse for pellet storage.
[Rule 62-296.320(4)(c)2., F.A.C.; 1050019-002-AC; Proposed by applicant in the initial Title V permit application received June 14, 1996]

Permitting Note: This condition implements the requirements of Rules 62-296.320(4)(c)1., 3., & 4., F.A.C. (see Condition No. 57. of APPENDIX TV-4, TITLE V CONDITIONS)

8. Excess emissions resulting from startup, shutdown or malfunction of any source shall be permitted providing (1) best operational practices to minimize emissions are adhered to (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.[Rule 62-210.700(1), F.A.C.]

Permitting Note: This rule can not vary any requirement of an NSPS or NESHAP provision.

9. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown, or malfunction shall be prohibited.
[Rule 62-210.700(4), F.A.C.]

10. A statement that a situation arising from sudden and unforeseeable events beyond the control of the source which causes an exceedance of a technology-based emissions limitation because of unavoidable increases in emissions attributable to the situation and which requires immediate corrective action to restore normal operation, shall be an affirmative defense to an enforcement action in accordance with the provisions and requirements of 40 CFR 70.6(g)(2) and (3).
[Rule 62-213.440(1)(d)5, F.A.C.]

Test Methods and Procedures

11. Compliance with the monitoring requirements of this permit for monitoring equipment not previously installed prior to issuance of this permit shall commence on the date of the next required compliance test after issuance of this permit.

[Rule 62-213.440(1)(b), F.A.C.]

12. The requirements for stack sampling facilities, source sampling and reporting, shall be in accordance with Chapter 62-297, F.A.C., *Stationary Sources - Emission Monitoring* and 40 CFR 60, Appendix A.

[Rule 62-297.401, F.A.C.]

13. The visible emissions test shall be conducted by a certified observer and be a minimum of thirty minutes in duration, unless otherwise specified within. The test observation period shall include the period during which the highest opacity can reasonably be expected to occur.

[Rule 62-297.310(4)(a)2, F.A.C.]

14. Testing of emissions shall be conducted with the source operating at permitted capacity. Permitted capacity is defined as 90-100 percent of the maximum operating rate allowed by the permit. If it is impracticable to test at permitted capacity, then sources may be tested at less than capacity; in this case subsequent source operation is limited to 110 percent of the test load until a new test is conducted. Once the unit is so limited, then operation at higher capacities is allowed for no more than 15 consecutive days for the purposes of additional compliance testing to regain the permitted capacity in the permit. In no case shall the process or production rate exceed the maximum permitted process or production rate. The actual process or production rate during the test shall be included in each test report. Failure to include the actual process or production rate in the results may invalidate the test. In addition, the test results shall include any operating parameters limited or specified to be recorded in this permit, e.g., scrubber flow rate.

[Rules 62-4.070(3) and 62-297.310(2), F.A.C.]

15. If the Department of Environmental Protection has reason to believe that any applicable emission standard is being violated, then the Department of Environmental Protection may require the permittee to conduct compliance tests which identify the nature and quantity of pollutant emissions and to provide a report on the results of the tests.

[Rule 62-297.310(7)(b), F.A.C.]

Recordkeeping and Reporting Requirements

16. The permittee shall notify the Air Compliance Section of the Southwest District Office of the Department at least 15 days prior to the date on which each formal compliance test is to begin of the date, time, and place of each such test, and the contact person who will be responsible for coordinating and having such test conducted.

[Rule 62-297.310(7)(a)9, F.A.C.]

17. The permittee shall submit to the Air Compliance Section of Southwest District Office of the Department each calendar year, on or before March 1, a completed DEP Form 62-213.900 (5), an "Annual Operating Report for Air Pollutant Emitting Facility", for the preceding calendar year.

In order to properly complete the annual operating report (AOR) regarding actual emissions, such as "volatile organic compounds" and "carbon monoxide", the permittee shall implement methods, sampling, recordkeeping, and/or any other procedures, etc. that are necessary to produce the required information. The annual "Statement of Compliance" (ref. Appendix TV-4, item 51) shall be submitted with the AOR.
[Rule 62-210.370(3), F.A.C., ref. Appendix TV-4, item 24]

{Permitting note(s): VOC emissions from plant wastewater-stream's sprayfield could be as much as 317 tons per year, however this value assumes all peel oil in wastewater is volatilized. Actual emissions may be significantly less considering the absorption into the soil and biodegradation of the oils.}

18. Test Reports

a. The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Air Compliance Section of Southwest District Office of the Department, and the applicable local program(s) on the results of each such test.

b. The required test report shall be filed with the Department as soon as practical but no later than 45 days after the last sampling run of each test is completed or with the operating permit application, whichever is earlier.

c. The report shall provide sufficient detail on the emissions unit tested (at a minimum, the "Project", "Facility ID" and "Point ID"), the test procedures used to allow the Department to determine if the test report was properly conducted and the test results properly computed. Testing procedures shall be consistent with the requirements of Rule 62-297.310(7), F.A.C.

d. The test report, other than for an EPA or DEP Method 9 test, as a minimum, shall provide the following information:

1. The normal type and amount of fuels used and materials processed, and the types and amounts of fuels used and material processed during each test run.
2. The normal operating parameters of air pollution control devices installed on each emission unit (e.g., pressure drop, scrubber liquid flow rate, scrubber liquid pressure, total current, etc.), and the operating parameters of air pollution control devices during each test run.

Failure to submit the rates and actual operating conditions in the test report may invalidate the test and fail to provide reasonable assurance of compliance.

[Rules 62-297.310(8), F.A.C., and 62-4.070(3), F.A.C.]

19. Hours of Operation - Unless otherwise noted, all emission units are allowed to operate continuously, i.e., 8760 hours per year.

[Rule 62-210.200, F.A.C. - Definitions (PTE)]

20. At a minimum, all records and logs required by this permit shall be updated monthly. (Also reference appendix TV-4, items 12.(14)(b), and 12.(14) (c) and 42.)
[Rule 62-4.070(3), F.A.C.]

21. When appropriate, any recording, monitoring, or reporting requirements that are time-specific shall be in accordance with the effective date of the permit, which defines day one.
[Rule 62-213.440, F.A.C.]

22. The permittee shall submit all compliance related notifications and reports required of this permit to the Department's Southwest District office:

Department of Environmental Protection
Southwest District Office
3804 Coconut Palm Drive
Tampa, Florida 33619-8218
Telephone: 813/744-6100
Fax: 813/744-6458

23. Any reports, data, notifications, certifications, and requests required to be sent to the United States Environmental Protection Agency, Region 4, should be sent to:

United States Environmental Protection Agency
Region 4
Air, Pesticides & Toxics Management Division
Air & EPCRA Enforcement Branch, Air Enforcement Section
61 Forsyth Street
Atlanta, Georgia 30303-8960
Telephone: 404/562-9155
Fax: 404/562-9163

24. Certification by Responsible Official (RO). In addition to the professional engineering certification required for applications by Rule 62-4.050(3), F.A.C., any application form, report, compliance statement, compliance plan and compliance schedule submitted pursuant to Chapter 62-213, F.A.C., shall contain a certification signed by a responsible official that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. Any responsible official who fails to submit any required information or who has submitted incorrect information shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary information or correct information. [Rule 62-213.420(4), F.A.C.]

Cargill Citro Pure, L.P.
Frostproof Plant

DRAFT Permit No.: 1050019-008-AV

25. Emission units subject to New Source Performance Standards (NSPS) are subject to the provisions of 40 CFR 60 Subpart A - General Provisions. A copy of 40 CFR 60 Subpart A - General Provisions is available from the Department upon request.

(Permitting Note: As of the effective date of this Title V permit, no emission units at this facility are subject to the NSPS.)

[Rule 62-204.800, F.A.C.]

NOTES to PERMITTEE:

Please reference the Permit No., Facility ID No., and appropriate Emissions Unit(s) ID No(s). on all correspondence, test report submittals, applications, etc.

Table 1-1, Summary of Air Pollutant Standards and Terms, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

Table 2-1, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

Permit Renewal - Reference Appendix TV-4, item 5

Section III. Emissions Unit(s) and Conditions.

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

E.U.

<u>ID No.</u>	<u>Brief Description</u>
-001	Citrus Peel Dryer No. 1
-006	Citrus Pellet Cooler

{Permitting Note: In the following description and limitations, note that references to Citrus Peel Dryer No. 2 (Emission Unit No. 008) are from construction permit AC53-269709. Construction of Citrus Peel Dryer No. 2 was anticipated during calendar year 2001; however, it has not been constructed and is not part of this permit.}

The two citrus peel dryers (No. 1 and No. 2) are is fired on natural gas or No. 2 (distillate) fuel oil with a maximum sulfur content of 0.3% by weight at a maximum combined heat input rate of 133,118 MMBtu/hour (corresponds to 118 Mscf/hour of natural gas or 842.9 gallons of No. 2 fuel oil at 140,000 Btu/gal) 85 MMBtu/hour maximum for each individual dryer, with backup fuel of new No. 2 (distillate) fuel oil with a maximum sulfur content of 0.3% by weight, fired at a maximum combined heat input rate of 118 MMBtu/hour. The maximum combined peel dryer process material input rate is 158,667 141,667 pounds/hour (79.3 70.83 tons/hour) of pressed peel (at approximately 70% moisture), with a maximum production rate of 56,000 50,000 pounds/hour (28 25.0 tons/hour) of dried peel (at approximately 15% moisture). ~~The maximum process material input rate for each peel dryer individually is 102,000 pounds/hour (51.0 tons/hour) of pressed peel, with a maximum production rate of 36,000 pounds/hour (18 tons/hour) of dried peel.~~ Exhaust gas from each of the peel dryers is first passed through high efficiency cyclones to remove particulate matter, and then goes to a waste heat evaporators (WHE) and through a spray scrubbers before being finally exhausted to the atmosphere through separate a 76 foot tall stacks.

The Sprout-Bauer, Inc. Model DP74CS, horizontal double-pass pellet cooler has a maximum process input rate of 56,000 50,000 pounds/hour (28 25.0 tons/hour) of dried peel (from the peel dryers) and a maximum production rate of 56,000 50,000 pounds/hour (28 25.0 tons/hour) of pellets.

Particulate emissions from the pellet cooler are vented through five (5) MAC Equipment, Inc. Model HE43 hi-efficiency dry cyclone collectors.

{Permitting note(s): These emissions units are regulated under Rule 62-296.320, F.A.C., General Pollutant Emission Limiting Standards.}

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

Essential Potential to Emit (PTE) Parameters

A.1. Capacity.

- a. The maximum process input rate to the citrus peel dryers shall not exceed a ~~combined total of 158,667~~ 141,667 pound per hour (~~79.3~~ 70.83 tons per hour) of pressed peel for both peel dryers (daily average basis);
- b. ~~The maximum process input rate for each citrus peel dryer shall not exceed 102,000 pound per hour (51.0 tons per hour) of pressed peel for each peel dryer (daily average basis);~~
- ~~eb.~~ The maximum process input rate to the pellet cooler shall not exceed ~~56,000~~ 50,000 pound per hour (~~28.0~~ 25.0 tons per hour) of dried peel (daily average basis);
- ~~dc.~~ The maximum fuel firing rate shall not exceed any of those shown below:
 - i. ~~133~~ 118 Mscf/hour of natural gas for both dryers, combined, on a monthly average basis (corresponds to a maximum heat input rate of ~~133~~ 118 MMBtu/hr based on a natural gas heat content of 1,000 Btu/scf);
 - ii. ~~85~~ Mscf/hour of natural gas for each dryer, individually, on a monthly average basis (corresponds to a maximum heat input rate of 85 MMBtu/hr based on a natural gas heat content of 1,000 Btu/scf);
 - ~~iiij.~~ iii. 842.9 gallons/hour of No. 2 fuel oil for both dryers, combined, on a monthly average basis (corresponds to a maximum heat input rate of 118 MMBtu/hr based on a fuel oil heat content of 140 MMBtu/gal);
 - ~~iv.~~ Total combined natural gas usage for both of the peel dryers shall not exceed 634.4 MMscf/any 12 consecutive month period;
 - ~~v.~~ Total combined No. 2 fuel oil usage for both of the peel dryers shall not exceed 4,531,430 gallons/any 12 consecutive month period.

[Rules 62-4.160(2), F.A.C. and 62-210.200, F.A.C., Definitions - (PTE), AC53-269709243272]

~~{Permitting Note: The above process input rates correspond to a combined maximum production rate of 56,000 pound per hour (28.0 tons per hour) of dried peel from both peel dryers and maximum individual production rates of 36,000 pound per hour (18.0 tons per hour) of dried peel from each peel dryer.}~~

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

The citrus peel dryers shall be fired only with natural gas or new No. 2 (distillate) fuel oil with a sulfur content not to exceed 0.3% S by weight. No used or recycled oil shall be fired.

[Rules 62-210.200(233), F.A.C., 62-4.160(2), F.A.C. and 62-213.440(1), F.A.C.; AC53-269709243272]

A.3. Hours of Operation. The hours of operation for ~~each of~~ the citrus peel dryers and the pellet cooler shall not exceed 5,376 hours per any 12 consecutive month period.
[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; AC53-~~269709~~[243272](#)]

Emission Limitations and Standards

A.4. The maximum allowable emission rate of particulate matter from ~~each of~~ the citrus peel dryer/waste heat evaporator stacks for the maximum ~~individual~~ dryer process input rate of ~~102,000~~[141,667](#) pounds per hour (~~51.070.83~~ tons/hour) is ~~32.534.2~~ pounds per hour as set by the Process Weight Table contained within Rule 62-296.320(4)(a), F.A.C. At lesser process input rates the allowable emission rates can be determined from the appropriate equation. In combination with the operating hour limitation contained in Condition A.3, this results in a maximum allowable annual particulate matter emissions of ~~167.792.0~~ tons per year from ~~both the peel dryers combined~~.
[Rule 62-296.320(4)(a), F.A.C.; AC53-~~269709~~[243272](#)]

A.5. The maximum allowable emission rate of particulate matter from the pellet cooler for the maximum process input rate of ~~56,000~~[50,000](#) pounds per hour (~~28.025.0~~ tons per hour) of dried peel is ~~28.326.4~~ pounds per hour as set by the Process Weight Table contained within Rule 62-296.320(4)(a), F.A.C. At lesser process input rates the allowable emission rates can be determined from the appropriate equation. In combination with the operating hour limitation contained in Condition A.3, this results in maximum allowable annual particulate matter emissions of ~~76.271.0~~ tons per year.
[Rule 62-296.320(4)(a), F.A.C.; AC53-~~269709~~[243272](#)]

A.6. Visible emissions from the peel dryer/waste heat evaporator stacks shall not be equal to or greater than 20% opacity.
[Rule 62-296.320(4)(b)(1), F.A.C.; AC53-~~269709~~[243272](#)]

A.7. In lieu of a particulate matter stack test on the pellet cooler, the Department has established an alternative visible emission standard of $\leq 5\%$.
[Rule 62-4.070(3), F.A.C.]

Test Methods and Procedures

A.8. The ~~No. 1 and No. 2~~ citrus peel dryer/waste heat evaporator exhaust stacks shall be tested for particulate matter and visible emissions annually on, or during the 60 day period prior to February 11. Emission testing shall be conducted while operating the dryers within 90 - 100% of the maximum process input rate of ~~51.0~~70.83 tons/hr. (daily average) for ~~each the~~ dryer ~~and 79.3 tons/hr for a combined total for Nos. 1 and 2 Citrus Peel Dryers~~, when practical. If it is not practical to test at the maximum process input rate, then the source may be tested at a lower rate. A compliance test submitted at a rate less than 90% of the maximum permitted rate shown above will automatically constitute an amended permit at 110% of the test rate. Once the unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity. (Clarification: When a unit is limited to an operating rate of 110% of the test rate, the permittee may provide a 15-day notice of its intent to conduct an additional test. The notice may specify a 15-day period during which the unit will be allowed to operate at a higher rate for the purpose of additional testing. For example, the first five days of the 15-day period may be used to bring the unit up to a higher production level; the next five days may be used for the testing itself; and the remainder of the period may be used to return the unit to the permitted capacity that existed before the most recent test. Upon written approval by the department of the most recent test results, the unit may then operate at a 110% of the most recent test load, not to exceed the maximum permitted rate.) The test results shall be submitted to the Air Compliance Section of this office within 45 days of testing. Acceptance of the test by this office will automatically constitute an amended permit at the higher tested rate plus 10%, but in no case shall the maximum permitted rate shown above be exceeded. Failure to submit the following records with the test report may invalidate the test and fail to provide reasonable assurance of compliance:

- The pressed wet peel input rate to the dryer during the test.
- The natural gas or fuel oil usage rate to the dryer during the test.
- If applicable, documentation of the fuel oil's type and sulfur content that was used during the test.
- The WHE's scrubbers exit temperature shall be recorded during the particulate emission compliance test. At least one reading shall be taken and recorded during each run of the particulate emission compliance test and the readings shall be included with any peel dryer test report.

A.9. In order to demonstrate compliance with Condition A.7., the pellet cooler cyclone exhaust stack shall be tested for visible emissions annually on, or during the 60 day period prior to February 11. Testing of emissions must be conducted when the emission unit being tested is in operation and the test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur. A statement of the process input rate (tons/hr.) to the pellet cooler shall be included with all emission test reports.

[Rules 62-297.310(7)(a)4. and 62-4.070(3), F.A.C.; AC53-~~269709~~243272]

Should the Department have reason to believe the particulate emission standard for the pellet cooler is not being met, the Department may require that compliance with the particulate emission standard be demonstrated by stack testing the pellet cooler in accordance with Chapter 62-297, F.A.C.

[Rules 62-297.310(7)(b), F.A.C. and 62-4.070(3), F.A.C.]

A.10. Compliance with the limitations of Conditions A.4, A.5, A.6, and A.7 shall be determined using EPA Methods 1, 2, 3, 4, 5 and 9 contained in 40 CFR 60, Appendix A and adopted by reference in Chapter 62-297, F.A.C. The visible emissions tests shall be conducted by a certified observer and be a minimum of thirty (30) minutes in duration for the peel dryer and thirty (30) minutes for the pellet cooler. 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. When using EPA Method 5, an acetone wash shall be used and the minimum sample volume shall be 32 dry standard cubic feet.

[Rule 296.320(4), F.A.C. and Chapter 62-297, F.A.C.]

A.11. Compliance testing of the citrus peel dryer shall be conducted when firing No. 2 fuel oil if fuel oil has been used in the peel dryer for more than 400 hours for the previous 12 months, or if it is expected to be used in the peel dryer for more than 400 hours during the next 12 months. If the most recent test was conducted while firing natural gas and if, in the 12 month period following the test, No. 2 fuel oil is burned for more than 400 hours, then an additional VE test (while burning No. 2 oil in the dryer) shall be conducted within 30 days of having passed the 400th hour of burning fuel oil. The permittee shall submit a statement of the fuel operating mode (type of fuel and heat input rate) as a part of the compliance test report. Failure to submit the fuel operation mode statement may invalidate the data and fail to provide reasonable assurance of compliance.

[Rule 62-4.070(3), F.A.C.; AC53-~~269709~~243272]

A.12. If particulate and visible emission testing is conducted while firing No. 2 fuel oil, compliance with the No. 2 fuel oil sulfur content limitation of Condition A.2 shall be demonstrated during the test 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

A.13. In order to document compliance with the Condition A.1. and A.3., the permittee shall maintain the following records:

DRYER:

Daily

- a. The total amount of pressed peel to the dryer, in tons.
- b. The total operating hours of using natural gas.
- c. The total operating hours of using fuel oil.
- d. The total operating hours. (Note, the citrus peel dryer is considered in operation any time that fuel is being fired and pressed peel is being processed.)
- e. The daily average input rate of pressed peel to the dryer, in tons/hr.
- f. If the most recent visible emission test for the dryer was conducted when using natural gas, then in order to determine when a new visible emission test is required, daily record the cumulative hours of using fuel oil until the 400th hour is recorded.

Monthly

- g. The total operating hours for the month when using natural gas.
- h. The total operating hours for the month when using fuel oil.
- i. The total operating hours for the month when using natural gas and fuel oil.
- j. The total amount of natural gas fired in the dryer, in Mscf.
- k. The monthly average natural gas usage rate in the dryer, in Mscf/hour.
- l. The total amount of fuel oil fired in the dryer, in gallons.
- m. The monthly average fuel oil usage in the dryer, in gallons/hour.
- n. The most recent consecutive 12 month period total operating hours.

PELLET COOLER

Daily

- o. The total amount of pressed peel to the cooler (or production), in tons.
- p. The total operating hours.
- q. The daily average input rate of the pressed peel to the cooler, in tons/hr.

Monthly

- r. The total operating hours for the month.
- s. The most recent consecutive 12 month period total operating hours.

Daily records shall be completed within 5 business days and monthly record shall be completed by the end of the following month. These records shall be recorded in a permanent form suitable for inspection by the Department upon request.

[Rule 62-213.440, F.A.C.]

A.14. In order to document continuing compliance with Condition A.2, records of the sulfur content, in % by weight, of the No. 2 fuel oil used in the citrus peel dryers 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, F.A.C.]

A.15. The permittee shall keep a daily log of the citrus peel dryer/WHE's scrubbers outlet temperature. An entry shall be made in the log at least once per 8-hour shift. These records shall be retained and recorded in a permanent form suitable for inspection by the Department upon request. A copy of the scrubber operation log sheet for the day of any compliance test shall be submitted to the Department with the test report.

[Rule 62-213.440(1), F.A.C.]

A.16. The WHE's scrubbers outlet temperature shall be maintained at no greater than 20 degrees F above the average of the temperature measured and recorded during the most recent particulate matter emission compliance test. This temperature shall be recorded at least once during each 8-hour shift.

[Rules 62-210.650 and 62-213.440(1), F.A.C.]

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

E.U.

<u>ID No.</u>	<u>Brief Description</u>
-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 **very low sulfur** No. 2 (distillate) fuel oil with a maximum sulfur content of ~~0.30%~~ **0.05%** 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~~ **8,760** hours per any consecutive 12 month period. **No. 2 Fuel Oil consumption is limited to 3,400,000 gallons per year.**

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).

- 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. No. 2 fuel oil usage from Boiler No. 2 shall not exceed 3,400,000 gallons per any 12 consecutive month period.
- ~~h.~~ i. 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; Permit Number 1050019-007-AC]

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.~~
- a. Boiler No. 1 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. 2 shall be fired with only natural gas or new No. 2 fuel oil with a maximum sulfur content of 0.05% by weight. No used or recycled oil shall be fired.
- ~~b.~~ c. 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; Permit Number 1050019-007-AC]

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.~~
2. The hours of operation for Boiler No. 2 are not limited.
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; Permit Number 1050019-007-AC]

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 Boiler No. 2 in gallons.
- ~~k.~~ l. 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]

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

Cargill Citro Pure, L.P.
Frostproof Plant

DRAFT Permit No.: 1050019-008-AV
Facility ID No.: 1050019

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

E.U. ID No. Brief Description

- 001 Citrus Peel Dryer No. 1
- 006 Citrus Pellet Cooler

E.U. ID No.	Pollutant Name	Fuel(s)	Hours/Yr	Allowable Emissions			Equivalent Emissions*		Regulatory Citation(s)	See Permit Condition(s)
				Standard(s)	lbs./hour	TPY	lbs./hour	TPY		
-001	PM	fuel oil/ nat. gas	5,376	32.5 <u>34.2</u> lbs/hr and process Weight table	32.5 <u>34.2</u>		32.5 <u>34.2</u>	87.4 <u>92.0</u>	62-296.320(4), F.A.C., AC53- 260700 <u>243272</u>	III. A.4.
	VE	fuel oil/ nat. gas	5,376	20% opacity	N/A	N/A	N/A	N/A	62-296.320(4)(b), F.A.C., AC53- 260700 <u>243272</u>	III. A.6.
	SO ₂	fuel oil	5,376	0.3% sulfur by weight			35.8 <u>35.9</u>	60.5 <u>96.5</u>	AC53- 260700 <u>243272</u>	III. A.2.
-006	PM		5,376	28.3 <u>26.4</u> lbs/hr and process weight table	28.3 <u>26.4</u>		28.3 <u>26.4</u>	76.4 <u>71.0</u>	62-296.320(4), F.A.C., AC53- 260700 <u>243272</u>	III. A.5.
	VE		5,376	5% opacity (in lieu of stack test)	N/A	N/A	N/A	N/A	62-4.070(3), F.A.C., AC53- 260700 <u>243272</u>	III. A.7.

Notes: *The "Equivalent Emissions" listed are for informational purposes only.
N/A: Not Applicable EBA: Established By Applicant

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

Cargill Citro Pure, L.P.
Frostproof Plant

DRAFT Permit No.: 1050019-008-AV
Facility ID No.: 1050019

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

E.U. ID No. Brief Description

- 004 Boiler No. 1
- 005 Boiler No. 2
- 007 Boiler No. 3

E.U. ID No.	Pollutant Name	Fuel(s)	Hours/Yr	Allowable Emissions			Equivalent Emissions*		Regulatory Citation(s)	See Permit Condition(s)
				Standard(s)	lbs./hour	TPY	lbs./hour	TPY		
-004, -005	VE	fuel oil/ nat. gas	5,376 for Boiler No. 1 &	20% opacity, except one two min. period/hour of 40% opacity	N/A	N/A	N/A	N/A	62-296.406(1), F.A.C.	III. B.4.
	SO ₂	fuel oil	8,760 for Boiler No. 2	0.30% sulfur by weight for Boiler No. 1 0.05% sulfur by weight for Boiler No. 2			20.2 for #1 3.39 for #2	54.2 for #1 12.1 for #2	62-296.401(6), F.A.C. F.A.C. - BACT determination 1/26/94 1050019-007-AC	III. B.2.
-007	VE	nat. gas	N/A	20% opacity, except one Two min. period/hour of 40% opacity			N/A	N/A	62-296.406(1), F.A.C. BACT determination 12/13/85	III. B.4.

Notes: *The "Equivalent Emissions" listed are for informational purposes only.
N/A: Not Applicable EBA: Established By Applicant

Table 2-1, Summary of Compliance RequirementsCargill Citro Pure, L.P.
Frostproof Plant**DRAFT Permit No.:** 1050019-008-AV
Facility ID No.: 1050019

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

E.U. ID No. Brief Description

-001 Citrus Peel Dryer No. 1
 -006 Citrus Pellet Cooler
 -004 Boiler No. 1
 -005 Boiler No. 2

E.U. ID No.	Pollutant Name or Parameter	Fuel(s)	Compliance Method	Testing Time Frequency	Frequency Base Date *	Min. Compliance Test Duration	CMS**	See Permit Condition(s)
-001	VE	fuel oil/ nat. gas	EPA Method 9	annual	11-February	30 minutes		III. A.8, A.10, A.11, & A.12.
	PM	fuel oil/ nat. gas	EPA Method 5	annual	11-February	1 hour		III. A.8, A.10, A.11 & A.12.
	SO ₂	fuel oil	fuel analysis	annual	11-February			III. A.11 & A.12.
-006	VE PM (waived per condition A.7)		EPA Method 9	annual	11-February	30 minutes		III. A.9. & A.10.
-004, 005	VE	fuel oil/ nat. gas	DEP Method 9	annual	11-Feb	60 minutes		III. B.5, B.6, B.7 & B.8.
	SO ₂	fuel oil	fuel analysis	annual	11-Feb			III. B.9.
Notes: *Frequency base date established for planning purposes only; see Rule 62-297.310, F.A.C. **CMS [=] continuous monitoring system								

Table 2-1, Summary of Compliance Requirements

Cargill Citro Pure, L.P.
Frostproof Plant

DRAFT Permit No.: 1050019-008-AV
Facility ID No.: 1050019

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

E.U. ID No. Brief Description

-007 Boiler No. 3

E.U. ID No.	Pollutant Name or Parameter	Fuel(s)	Compliance Method	Testing Time Frequency	Frequency Base Date *	Min. Compliance Test Duration	CMS**	See Permit Condition(s)
-007	VE	nat. gas	DEP Method 9	Year of renewal	11-Feb	60 minutes		III. B.5, B.6, & B.7.

Notes: *Frequency base date established for planning purposes only; see Rule 62-297.310, F.A.C.
**CMS [=] continuous monitoring system