Florida Department of Environmental Protection

Southwest District Office
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr.
Secretary

NOTICE OF CHANGE OF THE TITLE V AIR OPERATION PERMIT'S EXPIRATION DATE AND FINAL TITLE V AIR OPERATION PERMIT RENEWAL

In the Matter of a Request for a
Change in the Permit's Expiration Date and Permit Renewal:

Mr. Bart Plymale	DEP File No.: 0270003-015-AV
Vice President of Operations	DEP File No.: 0270003-016-AV
Peace River Citrus Products, Inc. PO Box 730 Arcadia, FL 34265	Peace River Citrus Products, Inc.
	DeSoto County

This is a notification that the Florida Department of Environmental Protection Southwest District (permitting authority) is changing the expiration date of the current Title V Air Operation Permit, No. 0270003-015-AV, while simultaneously issuing the FINAL Title V Air Operation Permit Renewal, No. 0270003-016-AV. The date and time that both permitting actions are effective are May 19, 2011, at 12:00 a.m. These changes in the current Title V Air Operation Permit's expiration date and the renewal of the Title V Air Operation Permit are based on your request received December 13, 2010.

NOTICE OF APPEAL RIGHTS

Any party to this order (permit) has the right to seek judicial review of the permit (letter) pursuant to Section 120.68, F.S., 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 Legal Office; 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 (thirty) days from the date this Notice is filed with the Clerk of the Department.

Executed in Hillsborough County, Florida.

Sincerely,

Cindy Zhang-Torres

Cindy Zhang-Torres, P.E.
Air Permitting Manager
Southwest District

CZT/NEK/pp

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF CHANGE OF THE TITLE V AIR OPERATION PERMIT'S EXPIRATION DATE AND FINAL TITLE V AIR OPERATION PERMIT RENEWAL (including the FINAL Determination and the FINAL Permit) was sent by electronic mail (or a link to these documents made available electronically on a publicly accessible server) with received receipt requested before the close of business on 05-19-2011 to the person(s) listed:

Mr. Bart Plymale: bartp@prcp.net
Mr. Wayne E. Griffin: G2Services@aol.com

Clerk Stamp

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

Patricia Ricketts 05-19-2011
(Clerk) (Date)

In addition, copies of this NOTICE OF CHANGE OF THE TITLE V AIR OPERATION PERMIT'S EXPIRATION DATE AND FINAL TITLE V AIR OPERATION PERMIT RENEWAL (including the FINAL Title V Air Operation Permit package) were sent electronically as noted to the person(s) listed:

Ms. Barbara Friday (posted electronically on DEP Darm_Common drive by permit engineer and email notification sent to Barbara Friday, BAR [Barbara.Friday@dep.state.fl.us] for posting with Region 4, U.S.EPA)

I. Comments.

No comments were received from the public during the 30-day public comment period. Comments were received from the USEPA during their 45-day review period of the PROPOSED Permit. The comments were not considered significant enough to issue a Revised DRAFT Permit and require another public notice. The changes made are shown below.

A. EPA Comments

1. **Comment:** Citrus Peel Dryer Permitted Capacity -While the reviewed Title V renewal permit allows a maximum heat input rate of 54.0 MMBtu/hr for the emissions unit (EU) 001 per Condition A.1, the construction permit being incorporated through the Title V permitting action and cited, allows a maximum heat input rate of 118.0 MMBtu/hr. The EPA requests the permitting authority revise these numbers and add a brief explanation in the Statement of Basis of the Title V renewal permit for the difference in allowable maximum heat input rate.

   Response: Construction Permit 0270003-014-AC was incorporated into Title V Operation Permit 0270003-015-AV. The maximum heat input rate was incorrect in Specific Condition No. A.1. of the construction permit. The emission unit description provided in the construction permit clearly states the peel dryer is fired at a maximum heat input rate of 54.0 MMBtu/hour. It was corrected in Operation Permit 0270003-015-AV and is correct in this permit. No change is made as the result of this comment.

2. **Comment:** Compliance test for PM/PM_{10} - The only requirement set forth in Section III, Subsection A for compliance with the emission limitation for particulate matter (PM) and PM with a diameter of 10 microns or less (PM_{10}) is on Condition A.12. This condition requires a PM/PM_{10} compliance test be performed prior to renewal. However, the application for the Title V permit (page 28) proposes an annual stack test as the method for compliance with PM/PM_{10} emission limitation. The EPA requests the permitting authority to add a condition to the permit requirement a more frequent PM/PM_{10} compliance testing.

   Response: Title V Operation Permit 0270003-015-AV required PM/PM_{10} testing prior to renewal. Per the Technical Evaluation dated, May 19, 2006, the potential PM/PM_{10} emissions from EU 001 are 33.8 TPY. Emissions testing done prior to renewal showed PM emissions were 70.33% below the allowable of 15 lb/hour. Annual PM/PM_{10} testing is not necessary. No change is made as the result of this comment.

3. **Comment:** Underlying Applicable Requirement -

   Per 40 CFR, Part 70.6(a)(1)(i),

   > *The permit shall specify and reference the origin of and authority for each term or condition, and identify any difference in form as compared to the applicable requirement upon which the term or condition is based.*

   An acceptable citation must include the underlying applicable requirement of the condition (i.e., a preconstruction or operation permit, a rule or regulation and section, or both) in which the requirements were originated. Condition A.12, Section III, Subsection A, cited the Construction Permit 0270003-014-AC as an underlying applicable requirement for the requirements set for testing prior to renewal. However, the

construction permit does not contain such requirements. The permitting authority should revise the incongruence and correct as needed. This apparent error also occurred in Conditions A.16.

Response: The citation of Construction Permit 0270003-014-AC was removed from Specific Condition Nos. A.12. and A.16., Section III. Subsection A.

FROM:

A.12. Compliance Tests Prior To Renewal – A compliance test shall be performed for PM/PM_{10} between 365 and 270 days before the expiration date of this permit to demonstrate compliance with the emission limits in Specific Condition A.6.
[Rules 62-210.300(2)(a) and 62-297.310(7)(a), F.A.C.; Construction Permit 0270003-014-AC]

TO:

A.12. Compliance Tests Prior To Renewal – A compliance test shall be performed for PM/PM_{10} between 365 and 270 days before the expiration date of this permit to demonstrate compliance with the emission limits in Specific Condition A.6.
[Rules 62-210.300(2)(a) and 62-297.310(7)(a), F.A.C.]

FROM:

A.16. Fruit Processing Rate – The permittee shall keep a log of and maintain monthly and consecutive 12 month rolling total records of fruit processing rates to demonstrate compliance with Specific Condition A.3. Such records shall be made from daily processing records and shall be completed no later than the 10th day of each following month.
[Rule 62-4.070(3), F.A.C.; Construction Permit 0270003-014-AC]

TO:

A.16. Fruit Processing Rate – The permittee shall keep a log of and maintain monthly and consecutive 12 month rolling total records of fruit processing rates to demonstrate compliance with Specific Condition A.3. Such records shall be made from daily processing records and shall be completed no later than the 10th day of each following month.
[Rule 62-4.070(3), F.A.C.]

4. **Comment:** Fruit Processing Rate - Condition A.16, Section III, Subsection A, requires the permittee to "keep a log of and maintain monthly and consecutive 12 month rolling totals records of fruit processing rates to demonstrate compliance with Specific Condition A.3." Later on it requires "such records... shall be completed no later than the 10th day of each following month." The condition requires the facility to keep monthly records but no reporting is specifically required. The EPA finds the requirement lack a reporting element.

Response: This recordkeeping requirement allows the Department to determine compliance with the fruit throughput limit in Specific Condition No. A.3. Facility-wide condition FW7. specifies that all recorded data shall be maintained at the facility by the permittee for a period of five years and made available to the Department upon request. The compliance inspector will review these records during an inspection so there is no need to report to the Department. No change is made as the result of this comment.

5. **Comment:** Hours of Operation - If the definition of "Box of citrus fruit" included in Condition A.3 applies to the requirements in Condition B.1, please insert it into it to maintain uniformity through the permit.

   Response: This definition was added to Specific Condition No. B.1.

   FROM:

   B.1. Hours of Operation - This emissions unit is allowed to operate, as necessary, to process 13.0 million boxes of citrus fruit in any consecutive 12 month period.
   [Rules 62-4.160(2) and 62-210.200 ("Potential to Emit"), F.A.C.; Construction Permit 0270003-014-AC]

   Permitting Note: For emission calculations, the hours of operation for these emissions units are estimated not to exceed a total of 4,500 hours per year.

   TO:

   B.1. Hours of Operation - This emissions unit is allowed to operate, as necessary, to process 13.0 million boxes of citrus fruit in any consecutive 12 month period. For purposes of this permit, a box of citrus fruit shall be defined to contain 90 pounds of oranges or 85 pounds of grapefruit.
   [Rules 62-4.160(2) and 62-210.200 ("Potential to Emit"), F.A.C.; Construction Permit 0270003-014-AC]

   Permitting Note: For emission calculations, the hours of operation for these emissions units are estimated not to exceed a total of 4,500 hours per year.

6. **Comment:** Testing Prior to Renewal - Section III, Subsection B, does not include a testing prior to renewal condition as in Subsection A, Condition A.12. EPA recommends the permitting authority directly incorporate such requirements into Subsection B if applicable.

   Response: Specific Condition No. B.10. allows PM stack testing to be waived for this emissions unit as long as its visible emissions do not exceed 5%. The Department believes that the 5% opacity limit (with annual visible emissions testing required) provides reasonable assurance that the PM limit of 5 pounds per hour will be met. If the facility fails the VE test then the emissions unit shall be tested for compliance with the particulate matter emission limit within 30 days after the failed visible emissions test. No change is made as the result of this comment.

7. **Comment:** Heat Input Rate, Condition C.15 - As written in the cited construction permit, at the end, this condition requires "the logs shall be maintained on file and shall be available to the Department upon request." The permitting authority should add this requirement into the Title V permit as it was originally part of the construction permit.

   Response: Facility-wide condition FW7. specifies that all recorded data shall be maintained at the facility by the permittee for a period of five years and made available to the Department upon request. No change is made as the result of this comment.

8. **Comment:** Federal Rule Requirements, Condition C.18 - In the response to the Department's Request for Additional Information (RAI), the applicant identified they were subject to 40 CFR 60. 40c, 41c, 42c, 43c, 45c, and 48c. However, it is not clear why they are not subject to 40 CFR 60.44c. "Compliance and performance test methods and procedures for sulfur dioxide." Please check the applicability to these requirements and revise Condition C.18 in the Title V permit accordingly.

Response: 40 CFR 60.44c was added to Specific Condition No. C.18. It should be noted that 40 CFR 60.44c(h) states that where the owner or operator seeks to demonstrate compliance with the SO_2 standards based on fuel supplier certification, the performance test shall consist of the certification from the fuel supplier. The requirement for a fuel analysis provided by the vendor or the permittee verifying the liquid fuel sulfur content upon each fuel delivery is in Specific Condition No. C.14.

FROM:

C.18. Federal Rule Requirements - In addition to the specific conditions listed above, this emissions unit is also subject to the applicable requirements contained in 40 CFR 60, Subpart A – General Provisions and 40 CFR 60 Subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units. The applicable provisions of Subpart Dc are listed below:

a. Applicability and delegation of authority.
   60.40c(a)
b. Definitions.
   60.41c
c. Standard for sulfur dioxide.
   60.42c
d. Standard for particulate matter.
   60.43c
e. Compliance and performance test methods and procedures for particulate matter.
   60.45c
f. Reporting and recordkeeping requirements.
   i. The owner or operator of each affected facility shall record and maintain records of the amounts of each fuel combusted during each day.
      40 CFR 60.48c(g)
   ii. The reporting period for the reports required under this subpart is each six-month period. All reports shall be submitted to the Administrator and shall be postmarked by the 30th day following the end of the reporting period.
      40 CFR 60.48c(j)

Note: The emissions limits in Specific Conditions C.4. – C.6. are at least as stringent as those specified in 40 CFR 60, Subpart Dc.

TO:

C.18. Federal Rule Requirements - In addition to the specific conditions listed above, this emissions unit is also subject to the applicable requirements contained in 40 CFR 60, Subpart A – General Provisions and 40 CFR 60 Subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units. The applicable provisions of Subpart Dc are listed below:

a. Applicability and delegation of authority.
   60.40c(a)

b. Definitions.
60.41c

c. Standard for sulfur dioxide.
60.42c

d. Standard for particulate matter.
60.43c

e. Compliance and performance test methods and procedures for sulfur dioxide.
60.44c(h)

f. Compliance and performance test methods and procedures for particulate matter.
60.45c

g. Reporting and recordkeeping requirements.

i. The owner or operator of each affected facility shall record and maintain records of the amounts of each fuel combusted during each day.
40 CFR 60.48c(g)

ii. The reporting period for the reports required under this subpart is each six-month period. All reports shall be submitted to the Administrator and shall be postmarked by the 30th day following the end of the reporting period.
40 CFR 60.48c(j)

Note: The emissions limits in Specific Conditions C.4. – C.6. are at least as stringent as those specified in 40 CFR 60, Subpart Dc.

II. Conclusion.

In conclusion, the changes that have been made are insignificant in nature and do not impose additional public noticing requirements. The permitting authority hereby issues the FINAL Permit, with any changes noted above.