



**TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION**

APPLICANT

Cutrale Citrus Juices USA, Inc.
602 McKean Street
Auburndale, Florida

Leesburg facility

Facility ID No. 0690002

PROJECT

Project No. 0690002-017-AV
Application for Title V Air Operation Permit Renewal
Project Name: Title V Air Operation Permit Renewal

COUNTY

Lake County, Florida

PERMITTING AUTHORITY

Florida Department of Environmental Protection
Waste & Air Resource Programs
Central District Office
3319 Maguire Blvd., Ste. 232, Orlando, FL 32803-3767

February 27, 2013 and March 12, 2013

Prepared by Jeffrey Rustin, P.E.

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GENERAL PROJECT INFORMATION

Air Pollution Regulations

Projects at stationary sources with the potential to emit air pollution are subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The statutes authorize the Department of Environmental Protection (Department) to establish regulations regarding air quality as part of the Florida Administrative Code (F.A.C.), which includes the following applicable chapters: 62-4 (Permits); 62-204 (Air Pollution Control – General Provisions); 62-210 (Stationary Sources – General Requirements); 62-212 (Stationary Sources – Preconstruction Review); 62-213 (Operation Permits for Major Sources of Air Pollution); 62-296 (Stationary Sources - Emission Standards); and 62-297 (Stationary Sources – Emissions Monitoring). Specifically, air construction permits are required pursuant to Rules 62-4, 62-210 and 62-212, F.A.C.

In addition, the U. S. Environmental Protection Agency (EPA) establishes air quality regulations in Title 40 of the Code of Federal Regulations (CFR). Part 60 specifies New Source Performance Standards (NSPS) for numerous industrial categories. Part 61 specifies National Emission Standards for Hazardous Air Pollutants (NESHAP) based on specific pollutants. Part 63 specifies NESHAP based on the Maximum Achievable Control Technology (MACT) for numerous industrial categories. The Department adopts these federal regulations on a quarterly basis in Rule 62-204.800, F.A.C.

Glossary of Common Terms

Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of this permit.

I. Project Description:

A. Applicant:

Aaron P. Corkum, Environmental Affairs Manager
Cutrale Citrus Juices USA, Inc.
602 McKean Street
Auburndale, Florida 33823-4070

B. Professional Engineer:

Scott Osbourn, P. E., Senior Consultant
Golder Associates, Inc.
5100 Lemon Street, Suite 208
Tampa, Florida, 33609

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C. Project Location:

11 Cloud Street
Leesburg, Florida, 34748

D. Project Summary:

The purpose of this permit is to renew the Title V air operation permit for the above referenced facility. Changes include reformatting to reflect the new Title V permit template and appendices. An additional change includes removal of an emission unit (EU No. 007- Cogeneration System for Turbine & Steam Generator), because it has been replaced with another emission unit (EU No. 009-New Cogeneration System Turbine & Existing Steam Generator).

E. Application Information:

Application Received: December 17, 2012
Requested information received January 25, 2013
Application Complete: January 25, 2013

II. PSD Applicability for Project

No increase in air emissions; therefore, this project is not subject to PSD preconstruction review. Construction Permit Project No. 0690002-012-AC had a PSD preconstruction review.

III. Rule Applicability

| Subject to: | Y/N | Comments |
|--|------------|---|
| Rule 62-212.400, F.A.C. - Prevention of Significant Deterioration | N | Facility is a PSD major source, but this renewal is not subject to PSD review |
| Rule 62-296.320(4), F.A.C. - General Particulate Emission Limiting Standards | Y | Facility operations could be a source of unconfined particulate matter emissions |
| Rules 62-296.320(1) and (2), F.A.C. - General Pollutant Emission Limiting Standards (VOCs and Odor) | Y | Facility is a source of VOCs. |
| Rule 62-204.800, F.A.C. - Standards of Performance for New Stationary Sources (NSPS- 40 CFR 60) | Y | <ul style="list-style-type: none">EU No. 004 (Process Steam Boiler No. 4) and EU No. 008 (Relocatable Boiler) are subject to NSPS Subpart Dc. |

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| Subject to: | Y/N | Comments |
|--|------------|--|
| | | <ul style="list-style-type: none"> • EU 009 (New Cogeneration System Turbine & Existing Steam Generator) subject to NSPS, Subpart KKKK. • Feed Mill Emergency Generator (EU No. 010) is subject to NSPS Subpart III. |
| Rule 62-204.800, F.A.C. National Emission Standard for Hazardous Air Pollutants (NESHAPS – 40 CFR 63) | Y | Both Emergency Generators (EU No. 010 and EU No. 11) are subject to NESHAP Subpart ZZZZ. |
| Chapter 62-213, F.A.C. - Operation Permits for Major Sources of Air Pollution | Y | Facility is a Title V source. |

IV. Summary of Emissions

| Pollutant | EU No. and brief description | Actual Emissions (tons per year) * | Potential Emissions (tons per year) ** |
|-----------------|------------------------------|------------------------------------|--|
| PM | Facility | 14.29 | 97 |
| NO _x | Facility | 26.96 | 143.2 |
| VOC | Facility | 160.57 | 853.9 |
| SO ₂ | Facility | 0.23 | 36.6 |
| CO | Facility | 286.74 | 413 |

* AOR-Calendar Year 2011

** Potential Emissions – levels have not been adjusted to take into account the reduction of the use of No. 2 fuel oil. Previously No. 2 fuel oil was used for all emission units. According to the application, fuel oil (No. 2 fuel oil) will only be used for the emergency generators. Natural Gas will be the only fuel used for the other emission units.

V. Federal NSPS and/or NESHAP Provisions

- 40 CFR 60, Subpart A, General Provisions;
- 40 CFR 60, Subpart Dc, Small Industrial-Commercial-Institutional Steam Generating Units;
- 40 CFR 60, Subpart KKKK, Standards for Stationary Combustion Turbines;
- 40 CFR 60, Subparts IIII, Stationary Compression Ignition Internal Combustion Engines;
- 40 CFR 63, Subparts A, General Provisions; and

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– 40 CFR 63, Subpart ZZZZ, Stationary Reciprocating Internal Combustion Engines.

VI. Conclusions

The emission limits proposed by the applicant will meet all of the requirements of Chapters 62-204 through 297, F.A.C.

The General and Specific Conditions listed in the proposed permit (attached) will assure compliance with all the applicable requirements of Chapters 62-204 through 297, F.A.C.

VII. Preliminary Determination

The Department makes a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations as conditioned by the draft permit. This determination is based on a technical review of the complete application, reasonable assurances provided by the applicant, and the conditions specified in the draft permit. Additional details of this analysis may be obtained by contacting the project engineer, Mr. Jeff Rustin, P.E., at Florida Department of Environmental Protection Central District Waste & Air Resource Programs, 3319 Maguire Blvd., Ste. 232, Orlando, FL 32803-3767. The e-mail address is DEP_CD@dep.state.fl.us. The phone number is 407-897-4100.