STATEMENT OF BASIS

Silver Springs Citrus, Inc.
Howie-In-The-Hills Facility
Facility ID No.: 0690014
Lake County

Title V Air Operation Permit
FINAL Permit No.: 0690014-010-AV

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.

This facility consists of a citrus peel dryer equipped with a waste heat evaporator; a pellet cooler; a cooling reel; and, three process steam boilers.

The Citrus Peel Dryer is equipped with a waste heat evaporator manufactured by Gulf Machinery Co. The dryer has a maximum heat input rate of 66.0 million Btu per hour and a maximum process rate of 21.23 tons of wet peel per hour. This emissions unit is regulated under Rule 62-210.300, F.A.C., Permits Required; and, the applicable requirements of 0690014-009-AC.

The pellet cooler is equipped with a cyclone (California Machinery, Model M21832) for product recovery. The cooling reel is equipped with a cyclone (Gulf Machinery, Model CMC25SF) for product recovery. Dried peel is split into two product steams. The majority of the peel, 4.3 tons per hour, is pelletized and then goes to the pellet cooler before ending up in a storage bin. A very small amount of the dried peel, 0.5 tons per hour, goes to the cooling reel as a dry flake product which then goes to a storage bin. These emissions units are regulated under Rule 62-210.300, F.A.C., Permits Required; and, the applicable requirements of 0690014-009-AC.

Process Steam Boiler No. 1 is a 750 hp Hurst, Series 400 boiler. This unit was installed March 4, 1988. This boiler has a maximum heat input rate of 32.0 million Btu per hour and can fire natural gas; propane; d-limonene; or, No. 2 distillate fuel oil with a maximum of 0.10 percent sulfur, by weight. Process Steam Boiler No. 3 is a 1200 hp Johnston boiler. This unit was installed April 30, 1996. This boiler has a maximum heat input rate of 46.6 million Btu per hour and can fire natural gas; propane; d-limonene; or, No. 2 distillate fuel oil with a maximum of 0.10 percent sulfur, by weight. The Johnson 750 HP Boiler is a Model 535 AHG boiler. This unit was installed April 30, 1996. This boiler has a maximum heat input rate of 32.0 million Btu per hour and can fire natural gas; propane; d-limonene; or, No. 2 distillate fuel oil with a maximum of 0.10 percent sulfur, by weight. 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 manufacture dates of the boilers predate the applicability date of NSPS - 40 CFR 60, Subpart Dc, Small Industrial-Commercial-Institutional Steam Generating Units, adopted and incorporated by reference in Rule 62-204.800(7)(b)4. The applicant states the facility is not a major source of hazardous air pollutants, therefore the MACT requirements of 40 CFR 63, Subpart DDDDD will not apply to the facility's boilers.

Generally speaking, for the CAM requirements of Part 64 to apply to an emissions unit, three conditions must be met: (1) The unit is subject to an emission limitation or standard for the applicable regulated air pollutant; (2) The unit uses a control device to achieve compliance with any such emission limitation or standard; and, (3) The unit has potential pre-control device emissions of the applicable regulated air pollutant that are major. The emissions units with emissions limits or standards at this facility are the citrus peel dryer with a PM/PM_{10} standard; the citrus pellet cooler and cooling reel with a PM/PM_{10} standard; and, the three boilers with PM and SO_2 standards. The citrus peel dryer includes an integral waste heat evaporator with water spray heads whose purpose is to keep the heat transfer surfaces clean; in doing so it also reduces particulate matter. Since the waste heat evaporator is integral to the operation of the citrus peel dryer, it is not considered a control device. The citrus pellet cooler and the cooling reel each have a cyclone to return product to the process and may not be considered a control device; also, the uncontrolled emissions of PM/PM10 from the cooler and cooling reel are below major. The three boilers do not employ control devices to meet their emissions standards. For these reasons, the CAM requirements of 40 CFR 64 do not apply to these emissions units.

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

Based on the Title V permit application received October 14, 2005, this facility is not a major source of hazardous air pollutants (HAPs).

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Directory:	C:\Documents and Settings\friday_b\Local Settings\Temporary Internet Files\OLK8E
Template:	C:\Documents and Settings\friday_b\Application Data\Microsoft\Templates\Normal.dot
Title:	(FOR TALLAHASSEE OFFICE USE ONLY)
Subject:	
Author:	DARM
Keywords:	
Comments:	
Creation Date:	9/5/2006 9:44:00 AM
Change Number:	3
Last Saved On:	9/5/2006 9:54:00 AM
Last Saved By:	svec_e
Total Editing Time:	1 Minute
Last Printed On:	9/8/2006 10:35:00 AM
As of Last Complete Printing	
Number of Pages:	2
Number of Words:	824 (approx.)
Number of Characters:	4,171 (approx.)