

STATEMENT OF BASIS

Title V Air Operation Permit Renewal
Permit No. 1050002-013-AV

APPLICANT

The applicant for this project is Florida's Natural Growers, Inc. The applicant's responsible official and mailing address are: Joe Emling, COO, Florida's Natural Growers, Inc., Florida's Natural Growers, 20205 US Hwy 27, Lake Wales, Florida 33853-3080.

FACILITY DESCRIPTION

The applicant operates the existing Florida's Natural Growers facility, which is located in Polk County at 20205 US Hwy 27, Lake Wales, Florida.

The facility consists of three citrus peel dryers with waste heat evaporators; two counter flow pellet coolers; three Erie City Keystone Boilers, two natural gas fired gas turbines; one natural gas fired waste heat boiler; multiple stationary engines; and one gasoline dispensing facility.

Citrus Peel Dryer No. 1 has a maximum process input rate of 40.0 tons per hour of pressed peel and lime, with a maximum product output rate of 13.0 tons/hour of dried peel. The peel dryer is fired at a maximum heat input rate of 50 MMBtu/hour. The dryer is fueled with natural gas or No. 2 distillate fuel oil with a maximum of 0.10 percent sulfur, by weight. The exhaust gas from the peel dryer is sent to a 50,000 pound/hour (water removal capacity) waste heat evaporator which functions as an indirect heat exchanger to drive moisture from the press liquor (from the peel press), and also acts as a particulate scrubber control device.

Citrus Peel Dryer No. 2 has a maximum process input rate of 80.0 tons per hour of pressed peel and lime, with a maximum product output rate of 26.0 tons/hour of dried peel. The peel dryer is fired at a maximum heat input rate of 100 MMBtu/hour. The dryer is fueled with natural gas or No. 2 distillate fuel oil with a maximum of 0.10 percent sulfur, by weight. The exhaust gas from the peel dryer is sent to a 120,000 pound/hour (water removal capacity) waste heat evaporator which functions as an indirect heat exchanger to drive moisture from the press liquor (from the peel press), and also acts as a particulate scrubber control device.

Citrus Peel Dryer No. 3 has a maximum process input rate of 80.0 tons per hour of pressed peel and lime, with a maximum product output rate of 26.0 tons/hour of dried peel. The peel dryer is fired at a maximum heat input rate of 100 MMBtu/hour. The dryer is fueled with natural gas or No. 2 distillate fuel oil with a maximum of 0.10 percent sulfur, by weight. The exhaust gas from the peel dryer is sent to a 100,000 pound/hour (water removal capacity) waste heat evaporator which functions as an indirect heat exchanger to drive moisture from the press liquor (from the peel press), and also acts as a particulate scrubber control device.

Two Technostaal Schouten, Inc., Model No. PCF040, counter flow citrus pellet coolers, designated as CF1 and CF2, are used to cool citrus pellets produced in a citrus processing operation. Emissions from each of the pellet coolers are controlled by a Torit Downflo II Model DFT-36 cartridge style air filtration unit. Each unit has 36 Therm-Tek cartridge filters having 7,200 square feet of filter media surface area and an automatic high-pressure air back flushing system.

Boiler No. 1 is an 875-horsepower boiler manufactured by Erie City Keystone. The boiler is fueled with natural gas or No. 2 distillate fuel oil with a maximum of 0.10 percent sulfur, by weight. It has a maximum heat input rate of 36.0 million Btu per hour and began operation in 1973.

Boiler No. 2 is a 2,000-hourspower boiler manufactured by Erie City Keystone. The boiler is fueled with natural gas or No. 2 distillate fuel oil with a maximum of 0.10 percent sulfur, by weight. It has a maximum heat input rate of 86.0 million Btu per hour and began operation in 1970.

Boiler No. 3 is a 2,000-horsepower boiler manufactured by Erie City Keystone. The boiler is fueled with natural gas or No. 2 distillate fuel oil with a maximum of 0.10 percent sulfur, by weight. It has a maximum heat input rate of 85.0 million Btu per hour and began operation in 1967.

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Gas Turbine No. 1 is a Solar Turbines Incorporated Centaur Type H combined cycle natural gas-fired turbine with a peak heat input rating of 51.1 million Btu per hour at approximately 66°F ambient air temperature. The turbine operates without add-on air pollution controls. The actual peak heat input rate of the turbine is a function of the ambient temperature as shown on the graph of Peak Heat Input versus Ambient Temperature, not included with this permit. The turbine drives a 3449-kW electric power generator. The combined cycle system utilizes the exhaust gas from the turbine in a waste heat recovery steam boiler, equipped with a duct burner (see Waste Heat Boiler w/ duct burner).

Gas Turbine No. 2 is a Solar Turbines Inc. Taurus 70-T9701S GCS combined cycle natural gas-fired gas turbine with a heat input rating of 76.0 million Btu per hour at 40°F inlet air temperature. The turbine operates without add-on air pollution controls. The actual peak heat input rate of the turbine is a function of the inlet air temperature as shown on the graph of Peak Heat Input versus Inlet Temperature, not included with this permit. The turbine drives a 7266-kW electric power generator. The combined cycle system utilizes the exhaust gas from the turbine in a waste heat recovery steam boiler (without a duct burner and therefore not an emission source) rated at 31,100 lb/hour of steam.

Waste Heat Boiler w/ duct burner recovers heat from the exhaust gas stream of Gas Turbine No. 1 and utilizes a supplemental natural gas duct burner with a maximum heat input rate of 91 million Btu per hour and has a maximum steam production capacity of 110,000 pounds per hour at 240 psig. This emissions unit is physically linked to emissions unit 012 (see Gas Turbine No. 1, above). The boiler was placed into service January 20, 1994.

There are seven emergency stationary compression ignition (CI) RICE engines at the facility. One of these engines, the emergency back-up generator to the Data Processing area, is regulated by 40 CFR 60 Subpart IIII – Standards of Performance for Stationary Compression Ignition Internal Engines. The other six are regulated by 40 CFR 63 Subpart ZZZZ – National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.

The Gasoline Dispensing Facility (GDF) consists of a stationary, fixed-roof 2,000-gallon gasoline tank for refueling operations, with a monthly throughput of less than 10,000-gallons per month. The GDF is regulated by 40 CFR 63 Subpart CCCCCC – National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities.

This facility also includes miscellaneous unregulated/insignificant emissions units and/or activities.

REGULATED EMISSIONS UNIT IDENTIFICATION NUMBERS AND DESCRIPTIONS

EU No.	Brief Description
001	Citrus Peel Dryer No. 2 with Waste Heat Evaporator
003	Erie City Keystone Boiler #3 using Natural Gas and #2 Oil
004	Erie City Keystone Boiler #2 using Natural Gas and #2 Oil
007	Citrus Peel Dryer No. 1 with Waste Heat Evaporator
011	Waste Heat Boiler 91.36 MMBtu/hr Natural Gas Fired
012	Natural Gas Turbine @ 51.1 MMBtu/hr (Approx. 66 Deg. F)
013	Citrus Peel Dryer No. 3 with Waste Heat Evaporator
017	Erie City Keystone Boiler #1 using Natural Gas and #2 Oil
022	Citrus Pellet Cooler CF1
023	Citrus Pellet Cooler CF2
027	Gas Turbine No. 2 w/WH Boiler

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031	“New” Emergency Back-up Generator Diesel Engines
032	Four (4) Existing Emergency Diesel Engines < 500 HP
033	Two (2) Existing Emergency Diesel Engines > 500 HP
037	Gasoline Dispensing Facility

APPLICABLE REGULATIONS

Based on the Title V air operation permit renewal application received on December 6, 2024, this facility is not a major source of hazardous air pollutants (HAP). The existing facility is a prevention of significant deterioration (PSD) major source of air pollutants in accordance with Rule 62-212.400, F.A.C. A summary of applicable regulations is shown in the following table:

Regulation	EU No(s).
<i>Federal Rule Citations</i>	
40 CFR 60, Subpart A, NSPS General Provisions	011, 012, 027, 031
40 CFR 60, Subpart GG, Standards of Performance for Stationary Gas Turbine	012 and 027
40 CFR 60, Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units	011
40 CFR 60, Subpart IIII, Standards of Performance for Stationary Compression Ignition Internal Combustion Engines	031
40 CFR 63, Subpart A, NESHAP General Provisions	032 and 033
40 CFR 63, Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines	032 and 033
40 CFR 63, Subpart CCCCCC, National Emission Standards for Hazardous Air Pollutant for Source Category: Gasoline Dispensing Facilities	037
Best Available Control Technology (BACT) requirements from the Technical Evaluation and Final Determination for Construction Permit 1050002-005-AC	003, 004, 011, 017
<i>State Rule Citations</i>	
Chapters 62-4, 62-204, 62-210, 62-213, 62-296, and 62-297	All
Rule 62-296.406, F.A.C., Fossil Fuel Steam Generators with Less Than 250 Million Btu Per Hour Heat Input, New and Existing Emissions Units	003, 004, 011, 017
Rule 62-297.620, F.A.C., Exceptions and Approval of Alternate Procedures and Requirements	022 and 023

PROJECT DESCRIPTION

The purpose of this permitting project is to renew the existing Title V permit for the above referenced facility.

PROCESSING SCHEDULE AND RELATED DOCUMENTS

Renewed Title V Air Operation Permit issued **July 21, 2020**

Application for a Title V Air Operation Permit Renewal received **December 6, 2025**

Additional Information Request dated **January 6, 2025**

Additional Information Response received **January 8, 2025**

Notice of Intent to Issue Air Permit issued **January 17, 2025**

Public Notice Published **January 24, 2025**

PRIMARY REGULATORY REQUIREMENTS

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Standard Industrial Classification (SIC) Code: 2037 – Frozen Fruits and Vegetables.

North American Industry Classification System (NAICS): 311411 – Frozen Fruit, Juice, and Vegetable Manufacturing.

HAP: The facility is not identified as a major source of hazardous air pollutants (HAP).

Title V: The facility is a Title V major source of air pollution in accordance with Chapter 62-213, Florida Administrative Code (F.A.C.).

PSD: The facility is a Prevention of Significant Deterioration (PSD)-major source of air pollution in accordance with Rule 62-212.400, F.A.C.

NSPS: The facility operates units subject to the New Source Performance Standards (NSPS) of 40 Code of Federal Regulations (CFR) 60.

NESHAP: The facility operates units subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) of 40 CFR 63.

CAIR: The facility is not subject to the Clean Air Interstate Rule (CAIR) set forth in Rule 62-296.470, F.A.C.

CAM: Compliance Assurance Monitoring (CAM) does not apply to any of the units at the facility. The waste heat evaporators act as scrubbers for particulate matter, but they are considered inherent process equipment to the peel dryers. The pellet coolers have cartridge filters to collect particulate matter (PM) emissions. The uncontrolled PM emissions from each cooler are well below 100 tpy.

GHG: The facility is not identified as a major source of greenhouse gas (GHG) pollutants.

PROJECT REVIEW

This renewal includes the following modifications:

- Whole permit was updated to current template.
- The company name was updated to reflect the transfer of Title V air permit from Citrus World, Inc. to Florida's Natural Growers, Inc. through Permit No. 1050002-012-AV.
- References relating to 40 CFR 60, Subpart IIII have been updated throughout the permit to reflect amendments made to the subpart after July 21, 2020.
- No changes were proposed or made to the previously permitted operations.

CONCLUSION

This project renews Title V air operation permit No. 1050002-011-AV, which was effective on July 21, 2020. This Title V air operation permit renewal is issued under the provisions of Chapter 403, Florida Statues (F.S.), and Chapters 62-4, 62-210, and 62-213, F.A.C.