

## **FINAL DETERMINATION**

### **Southern Gardens Citrus Processing Corporation**

**Project No.: 0510015-019-AC**

#### **I. Public Notice and Comments.**

The Public Notice of the permitting project was published in the Glades County Democrat on October 25, 2007. There were no written comments received in the commenting period (14-days), which concluded at the close of business of October 7, 2007. Proof of Publication of the Public Notice was received on October 30, 2007.

On October 30, 2007, the Department received notification, in accordance with condition 1, that Southern Gardens Citrus Processing Corporation will conduct the pilot study beginning November 14, 2007, through January 31, 2008.

#### **II. Conclusion.**

Since there were no comments received during the Public Notice period, no changes were made to the authorization letter and the permitting authority hereby issues the authorization letter as noticed.



# Florida Department of Environmental Protection

Bob Martinez Center  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Charlie Crist  
Governor

Jeff Kottkamp  
Lt. Governor

Michael W. Sole  
Secretary

November 9, 2007

CERTIFIED MAIL – Return Receipt Requested

Mr. Tristan Chapman  
Vice President  
Southern Gardens Citrus Processing Corporation  
1820 County Road 833  
Clewiston, Florida 33440

Dear Mr. Chapman:

Re: APPLICATION FOR SECOND PILOT TEST OF HIGHER SULFUR FUELS IN PEEL  
DRYER NUMBER 1  
File No. 0510015-019-AC

The Department has reviewed the request that you provided on September 10, and your response to our request for additional information dated October 8. We have considered the Department's legal authority to allow Southern Gardens Citrus Processing Corporation to conduct the requested testing and measurements on its Citrus Peel Dryer No. 1 located in Clewiston, Hendry County. The purpose is to determine if the SO<sub>2</sub> emission limit of 0.11 pound per million British thermal units (lb/MMBtu) can be met with the use of a higher sulfur content fuel oil, or alternatively, the maximum sulfur content fuel oil that can be burned while meeting the emission limit; to determine the efficacy of the SO<sub>2</sub> continuous emissions monitor (CEM); evaluate used oil as a potential fuel; and, evaluate the addition of various caustics to the integral scrubber on SO<sub>2</sub>. Paragraph 403.061(16), Florida Statutes (F.S.), authorizes the Department to encourage voluntary cooperation by persons in order to achieve the purposes of the State Environmental Control Act. Paragraph 403.061(18), F.S., authorizes the Department to encourage and conduct studies, investigations, and research relating to the causes and control of pollution. Rule 62-210.700(5), Florida Administrative Code (F.A.C.), authorizes the Department to consider variation in industrial equipment and make allowances for excess emissions that provide reasonable and practical regulatory controls consistent with public interest.

In accordance with the provisions of Paragraphs 403.061(16) and (18), F.S., and Rule 62-210.700(5), F.A.C., you are hereby authorized to conduct pilot testing and parameter measurements to determine if the SO<sub>2</sub> emission limit of 0.11 pound per million British thermal units (lb/MMBtu) can be met with the use of a higher sulfur content fuel oil, or alternatively, the maximum sulfur content fuel oil that can be burned while meeting the emission limit; to

determine the efficacy of the SO<sub>2</sub> CEM, evaluate used oil as a potential fuel; and, evaluate the addition of various caustics to the integral scrubber on SO<sub>2</sub>.

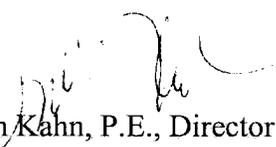
The pilot testing and parameter measurements or monitoring shall be subject to the following conditions:

1. The Permittee shall notify the Department's South District office and the Bureau of Air Monitoring and Mobile Sources at least 15 days prior to commencement of the performance tests and parameter measurements or monitoring. A written report, certified by a professional engineer registered in Florida, shall be submitted to these offices within 45 days upon completion of the last test run and parameter measurements and monitoring.
2. The authorized testing and measurement and monitoring schedule is from November 1, 2007, to January 31, 2008. If additional time is needed, the Permittee shall provide the Department with documentation of the progress accomplished to date and shall identify what is left to be done to complete the testing and measurements or monitoring.
3. The parameters to be measured or monitored are sulfur dioxide CEM, diluent content (oxygen or carbon dioxide), fuel type, ultimate fuel analyses, fuel flow, flue gas temperature, flue gas volumetric flow rate, scrubber flow rate, scrubber pH, type of caustic used, and other unit specific parameters that are needed to reduce the CEM data to 1-hour averages.
4. A quality assurance plan for the sulfur dioxide CEM shall be submitted and approved by the Department's Bureau of Monitoring and Mobile Sources prior to the start of the pilot test. The plan shall include the details of the pilot testing protocol.
5. Pilot testing shall immediately cease upon the occurrence of a valid environmental complaint by a citizen or other party, or a nuisance or danger to the public health or welfare. Pilot testing shall not resume until appropriate measures to correct the problem have been implemented.
6. Complete documentation of the activity shall be kept on file for at least 5 (five) years.
7. The Department shall be notified in writing on the date of the last test run and parameter measurement and monitoring completion.

Mr. Tristan Chapman  
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The Department has relied on the information referenced in the APPLICATION FOR SECOND PILOT TEST OF HIGHER SULFUR FUELS IN CITRUS PEEL DRYER NUMBER 1; the response to our request for additional information dated October 8, 2007; and, conversations with representatives of Southern Gardens Citrus Processing Corporation in authorizing this activity.

Sincerely,



Joseph Kahn, P.E., Director  
Division of Air Resource Management

JK/es

cc: David A. Buff, P.E., Golder Associates  
Juan Maldonado, Southern Gardens Citrus Processing Corp.  
A. J. Satyal, FDEP SD