Golder Associates Inc.

6241 NW 23rd Street, Suite 500
Gainesville, FL 32653-1500
Telephone (352) 336-5600
Fax (352) 336-6603

September 24, 2001

013755

Florida Department of Environmental Protection
Bureau of Air Regulation
2600 Blair Stone Road, MS #5505
Tallahassee, FL 32399-2400

Attention: Mr. Ed Svec, P.E.

RE: RELOCATED PEEL DRYER AND NEW PELLET MILL/COOLER
SOUTHERN GARDENS CITRUS PROCESSING CORPORATION
DEP FILE NO. 0510015-008-AC

Dear Mr. Svec:

In follow up to our recent discussions, Southern Gardens Citrus Processing Corporation (SGCPC) is hereby withdrawing the above referenced PSD permit application for an additional peel dryer/waste heat evaporator and pellet mill/cooler. Instead, SGCPC is submitting the attached minor source application for a backup peel dryer. The backup dryer (No. 2 Peel Dryer) will operate solely as a backup to the existing No. 1 Peel Dryer. The backup dryer will be connected to the existing waste heat evaporator system. As such, it will not be possible to operate the existing dryer and the proposed backup dryer simultaneously. The current facility limitation of 6,000 hours per year operation will apply to the combined operation of the dryers.

The capacity, emission factors, and potential emissions for the backup dryer are the same as for the existing dryer. As such, no increase in emissions is associated with this project.

Please find enclosed four (4) copies of the air construction permit application for the backup dryer. The backup dryer is an existing citrus peel dryer which will be relocated to the existing Southern Gardens citrus processing facility.

One copy of the application is also being submitted to the DEP South District Office in Fort Myers. Please feel free to contact me if you have questions concerning this application.

Sincerely,

GOLDER ASSOCIATES INC.

David A. Buff

David A. Buff, P. E., Q. E. P.
Principal Engineer

DB/lsh

cc: S. Watson
O. Rodriguez
D. Pridgen
W. Wehrum
Ron Blackburn, DEP Ft. Meyers

L092401

CONSTRUCTION PERMIT APPLICATION
FOR BACKUP PEEL DRYER

SOUTHERN GARDENS
CITRUS PROCESSING CORPORATION

CLEWISTON, FLORIDA

Prepared For:

Southern Gardens Citrus Processing Corporation
755 C.R. 833, P.O. Box 130
Clewiston, Florida 33440

Prepared By:

Golder Associates Inc.
6241 NW 23rd Street, Suite 500
Gainesville, Florida 32653-1500

September 2001
0137555

DISTRIBUTION:
4 Copies - FDEP
1 Copy - FDEP, Ft. Meyers
3 Copies - Southern Gardens
2 Copies - Golder Associates Inc.

Department of Environmental Protection

Division of Air Resources Management

APPLICATION FOR AIR PERMIT - TITLE V SOURCE

See Instructions for Form No. 62-210.900(1)

I. APPLICATION INFORMATION

Identification of Facility

1. Facility Owner/Company Name: **Southern Gardens Citrus Processing Corp.**	
2. Site Name: **Southern Gardens Citrus Processing Corp.**	
3. Facility Identification Number: **0510015** [ ] Unknown	
4. Facility Location: Street Address or Other Locator: **755 C.R. 833; P.O. Box 130** City: **Clewiston** County: **Hendry** Zip Code: **33440**	
5. Relocatable Facility? [ ] Yes [X] No	6. Existing Permitted Facility? [X] Yes [ ] No

Application Contact

1. Name and Title of Application Contact: **Derek Pridgen, Environmental Engineer**
2. Application Contact Mailing Address: Organization/Firm: **Southern Gardens Citrus Processing** Street Address: **755 CR 833; P.O. Box 130** City: **Clewiston** State: **FL** Zip Code: **33440**
3. Application Contact Telephone Numbers: Telephone: **(863) 983 - 3030** Fax: **(863) 983 - 3060**

Application Processing Information (DEP Use)

1. Date of Receipt of Application:	
2. Permit Number:	
3. PSD Number (if applicable):	
4. Siting Number (if applicable):	

Purpose of Application

Air Operation Permit Application

This Application for Air Permit is submitted to obtain: (Check one)

[ ] Initial Title V air operation permit for an existing facility which is classified as a Title V source.

[ ] Initial Title V air operation permit for a facility which, upon start up of one or more newly constructed or modified emissions units addressed in this application, would become classified as a Title V source.

Current construction permit number:_____

[ ] Title V air operation permit revision to address one or more newly constructed or modified emissions units addressed in this application.

Current construction permit number:_____

Operation permit number to be revised:_____

[ ] Title V air operation permit revision or administrative correction to address one or more proposed new or modified emissions units and to be processed concurrently with the air construction permit application. (Also check Air Construction Permit Application below.)

Operation permit number to be revised/corrected:_____

[ ] Title V air operation permit revision for reasons other than construction or modification of an emissions unit. Give reason for the revision; e.g., to comply with a new applicable requirement or to request approval of an "Early Reductions" proposal.

Operation permit number to be revised:_____

Reason for revision:_____

Air Construction Permit Application

This Application for Air Permit is submitted to obtain: (Check one)

[X] Air construction permit to construct or modify one or more emissions units.

[ ] Air construction permit to make federally enforceable an assumed restriction on the potential emissions of one or more existing, permitted emissions units.

[ ] Air construction permit for one or more existing, but unpermitted, emissions units.

Owner/Authorized Representative or Responsible Official

1. Name and Title of Owner/Authorized Representative or Responsible Official:
   Tristan Chapman, Vice President, General Manager
2. Owner/Authorized Representative or Responsible Official Mailing Address:
   Organization/Firm: **Southern Gardens Citrus Processing Corp.**
   Street Address: **755 CR 833**
   City: **Clewiston** State: **FL** Zip Code: **33440**
3. Owner/Authorized Representative or Responsible Official Telephone Numbers:
   Telephone: (**863**) **983 - 3030** Fax: (**863**) **983 - 3060**
4. Owner/Authorized Representative or Responsible Official Statement:

I, the undersigned, am the owner or authorized representative(check here [ ], if so) or the responsible official (check here [✓], if so) of the Title V source addressed in this application, whichever is applicable. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof. I understand that a permit, if granted by the Department, cannot be transferred without authorization from the Department, and I will promptly notify the Department upon sale or legal transfer of any permitted emissions unit.*

T. Huff — Signature

9-25-01 — Date

* Attach letter of authorization if not currently on file.

Professional Engineer Certification

1. Professional Engineer Name: **David A. Buff**
   Registration Number: **19011**
2. Professional Engineer Mailing Address:
   Organization/Firm: **Golder Associates Inc.**
   Street Address: **6241 NW 23rd Street, Suite 500**
   City: **Gainesville** State: **FL** Zip Code: **32653-1500**
3. Professional Engineer Telephone Numbers:
   Telephone: (**352**) **336 - 5600** Fax: (**352**) **336 - 6603**

4. Professional Engineer Statement:

I, the undersigned, hereby certify, except as particularly noted herein, that:*

(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this Application for Air Permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and

(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.

If the purpose of this application is to obtain a Title V source air operation permit (check here [ ], if so), I further certify that each emissions unit described in this Application for Air Permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance schedule is submitted with this application.

If the purpose of this application is to obtain an air construction permit for one or more proposed new or modified emissions units (check here [X], if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.

If the purpose of this application is to obtain an initial air operation permit or operation permit revision for one or more newly constructed or modified emissions units (check here [ ], if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.

David A. Buff
Signature

9/24/01
Date

(seal)

* Attach any exception to certification statement.

Scope of Application

Emissions Unit ID	Description of Emissions Unit	Permit Type	Processing Fee
	Backup No. 2 Peel Dryer	AC1B	

Application Processing Fee

Check one: [ ] Attached - Amount: $: _____ [X] Not Applicable

Construction/Modification Information

1. Description of Proposed Project or Alterations:

   This application is for the addition of a backup peel dryer. The backup peel dryer is existing equipment being moved from another citrus plant. The backup peel dryer will be connected to the existing waste heat evaporator and will be used only as a backup when the existing peel dryer is shutdown. Physical constraints prevent both the existing and backup peel dryer to operate at the same time.

2. Projected or Actual Date of Commencement of Construction: **1 Oct 2001**

3. Projected Date of Completion of Construction: **1 Jun 2002**

Application Comment

II. FACILITY INFORMATION

A. GENERAL FACILITY INFORMATION

Facility Location and Type

1. Facility UTM Coordinates: Zone: 17 East (km): 487.5 North (km): 2958.0			
2. Facility Latitude/Longitude: Latitude (DD/MM/SS): 26 / 44 / 30 Longitude (DD/MM/SS): 81 / 7 / 30			
3. Governmental Facility Code: 0	4. Facility Status Code: A	5. Facility Major Group SIC Code: 20	6. Facility SIC(s): 2037
7. Facility Comment (limit to 500 characters):			

Facility Contact

1. Name and Title of Facility Contact: Derek Pridgen, Environmental Engineer
2. Facility Contact Mailing Address: Organization/Firm: Southern Gardens Citrus Processing Street Address: P.O. Box 130 City: Clewiston State: FL Zip Code: 33440
3. Facility Contact Telephone Numbers: Telephone: (863) 983 - 3030 Fax: (863) 983 - 3060

Facility Regulatory Classifications

Check all that apply:

1. [ ] Small Business Stationary Source?	[ ] Unknown
2. [X] Major Source of Pollutants Other than Hazardous Air Pollutants (HAPs)?	
3. [ ] Synthetic Minor Source of Pollutants Other than HAPs?	
4. [X] Major Source of Hazardous Air Pollutants (HAPs)?	
5. [ ] Synthetic Minor Source of HAPs?	
6. [X] One or More Emissions Units Subject to NSPS?	
7. [ ] One or More Emission Units Subject to NESHAP?	
8. [ ] Title V Source by EPA Designation?	
9. Facility Regulatory Classifications Comment (limit to 200 characters):	
HAPs classification is based on limited test data.	

List of Applicable Regulations

All Federal regulatory citations reflect the rule language as of August 2001.
All State regulatory citations reflect the rule language as of August 2001.
Only those rules, regulations, and ordinances specifically identified herein apply to this facility.
See Attached Title V core list, effective date 3/25/97, except for 40CFR82.
Citrus Industry Legislation (FLL 403.08725).

Title V Core List

Effective:03/25/97

[Note: The Title V Core List is intended to simplify the completion of the "List of Applicable Regulations" that apply facility-wide (see Subsection II.B. of DEP Form No. 62-210.900(1), Application for Air Permit - Long Form. The Title V Core List is a list of rules to which all Title V Sources are presumptively subject. The Title V Core List may be referenced in its entirety, or with specific exceptions. The Department may periodically update the Title V Core List.

Requirements that apply to emissions units must be identified in Subsection III.B. of DEP Form No. 62-210.900(1), Application for Air Permit - Long Form.

Applicants must identify all "applicable requirements" in order to claim the "permit shield" described at Rule 62-213.460, F.A.C.]

Federal: ***(description)***

40 CFR 61: National Emission Standards for Hazardous Air Pollutants (NESHAP)
40 CFR 61, Subpart M: NESHAP for Asbestos.

40 CFR 82: Protection of Stratospheric Ozone.
40 CFR 82, Subpart B: Servicing of Motor Vehicle Air Conditioners (MVAC).
40 CFR 82, Subpart F: Recycling and Emissions Reduction.

State: ***(description)***

CHAPTER 62-4, F.A.C.: PERMITS, effective 10-16-95

62-4.030, F.A.C.: General Prohibition.
62-4.040, F.A.C.: Exemptions.
62-4.050, F.A.C.: Procedure to Obtain Permits; Application
62-4.060, F.A.C.: Consultation.
62-4.070, F.A.C.: Standards for Issuing or Denying Permits; Issuance; Denial.
62-4.080, F.A.C.: Modification of Permit Conditions.
62-4.090, F.A.C.: Renewals.
62-4.100, F.A.C.: Suspension and Revocation.
62-4.110, F.A.C.: Financial Responsibility.
62-4.120, F.A.C.: Transfer of Permits.
62-4.130, F.A.C.: Plant Operation - Problems.
62-4.150, F.A.C.: Review
62-4.160, F.A.C.: Permit Conditions.
62-4.210, F.A.C.: Construction Permits.
62-4.220, F.A.C.: Operation Permit for New Sources.

CHAPTER 62-103, F.A.C.: RULES OF ADMINISTRATIVE PROCEDURE, effective 12-31-95

62-103.150, F.A.C.: Public Notice of Application and Proposed Agency Action.
62-103.155, F.A.C.: Petition for Administrative Hearing; Waiver of Right to Administrative Proceeding

CHAPTER 62-210, F.A.C.: STATIONARY SOURCES - GENERAL REQUIREMENTS, effective 03-21-96

62-210.300, F.A.C.: Permits Required.
62-210.300(1), F.A.C.: Air Construction Permits.
62-210.300(2), F.A.C.: Air Operation Permits.
62-210.300(3), F.A.C.: Exemptions.
62-210.300(3)(a), F.A.C.: Full Exemptions.
62-210.300(3)(b), F.A.C.: Temporary Exemption.

62-210.300(5), F.A.C.: Notification of Startup.
62-210.300(6), F.A.C.: Emissions Unit Reclassification.

62-210.350, F.A.C.: Public Notice and Comment.
62-210.350(3), F.A.C.: Additional Public Notice Requirements for Sources Subject to Operation Permits for Title V Sources.

62-210.360, F.A.C.: Administrative Permit Corrections.

62-210.370(3), F.A.C.: Annual Operating Report for Air Pollutant Emitting Facility.

62-210.650, F.A.C.: Circumvention.

62-210.900, F.A.C.: Forms and Instructions.
62-210.900(1) Application for Air Permit - Long Form, Form and Instructions.
62-210.900(5) Annual Operating Report for Air Pollutant Emitting Facility, Form and Instructions.

CHAPTER 62-213, F.A.C.: OPERATION PERMITS FOR MAJOR SOURCES OF AIR POLLUTION, effective 03-20-96

62-213.205, F.A.C.: Annual Emissions Fee.
62-213.400, F.A.C.: Permits and Permit Revisions Required.
62-213.410, F.A.C.: Changes Without Permit Revision.
62-213.412, F.A.C.: Immediate Implementation Pending Revision Process.
62-213.420, F.A.C.: Permit Applications.
62-213.430, F.A.C.: Permit Issuance, Renewal, and Revision.
62-213.440, F.A.C.: Permit Content.
62-213.460, F.A.C.: Permit Shield.

62-213.900, F.A.C.: Forms and Instructions.
62-213.900(1) Major Air Pollution Source Annual Emissions Fee Form, Form and Instructions.

CHAPTER 62-256, F.A.C.: OPEN BURNING AND FROST PROTECTION FIRES, effective 11-30-94

CHAPTER 62-257, F.A.C: ASBESTOS NOTIFICATION AND FEE, effective 03/24/96

CHAPTER 62-281, F.A.C: MOTOR VEHICLE AIR CONDITIONING REFRIGERANT RECOVERY AND RECYCLING, effective 03-07-96

CHAPTER 62-296, F.A.C.: STATIONARY SOURCES - EMISSION STANDARDS, effective 03-13-96

62-296.320(2), F.A.C.: Objectionable Odor Prohibited.
62-296.320(3), F.A.C.: Industrial, Commercial, and Municipal Open Burning Prohibited
62-296.320(4)(c), F.A.C.: Unconfined Emissions of Particulate Matter

B. FACILITY POLLUTANTS

List of Pollutants Emitted

1. Pollutant Emitted	2. Pollutant Classif.	3. Requested Emissions Cap lb/hour	tons/year	4. Basis for Emissions Cap	5. Pollutant Comment
PM	A				Particulate Matter-Total
PM_{10}	A				Particulate Matter-PM_{10}
SO_2	A				Sulfur Dioxide
NO_X	A				Nitrogen Oxides
CO	A				Carbon Monoxides
VOC	A				Volatile Organic Compounds
HAPs	A				Total Hazardous Air Pollutants
H115	A				Methanol

C. FACILITY SUPPLEMENTAL INFORMATION

Supplemental Requirements

1. Area Map Showing Facility Location: [X] Attached, Document ID: SG-FE-1 [ ] Not Applicable [ ] Waiver Requested
2. Facility Plot Plan: [X] Attached, Document ID: SG-FE-2 [ ] Not Applicable [ ] Waiver Requested
3. Process Flow Diagram(s): [X] Attached, Document ID: SG-FE-3 [ ] Not Applicable [ ] Waiver Requested
4. Precautions to Prevent Emissions of Unconfined Particulate Matter: [ ] Attached, Document ID: _____ [X] Not Applicable [ ] Waiver Requested
5. Fugitive Emissions Identification: [ ] Attached, Document ID: _____ [X] Not Applicable [ ] Waiver Requested
6. Supplemental Information for Construction Permit Application: [X] Attached, Document ID: Attachment A [ ] Not Applicable
7. Supplemental Requirements Comment:

Additional Supplemental Requirements for Title V Air Operation Permit Applications

8. List of Proposed Insignificant Activities:
   [ ] Attached, Document ID:_____ [ ] Not Applicable

9. List of Equipment/Activities Regulated under Title VI:
   [ ] Attached, Document ID:_____
   [ ] Equipment/Activities On site but Not Required to be Individually Listed
   [ ] Not Applicable

10. Alternative Methods of Operation:
    [ ] Attached, Document ID:_____ [ ] Not Applicable

11. Alternative Modes of Operation (Emissions Trading):
    [ ] Attached, Document ID:_____ [ ] Not Applicable

12. Identification of Additional Applicable Requirements:
    [ ] Attached, Document ID:_____ [ ] Not Applicable

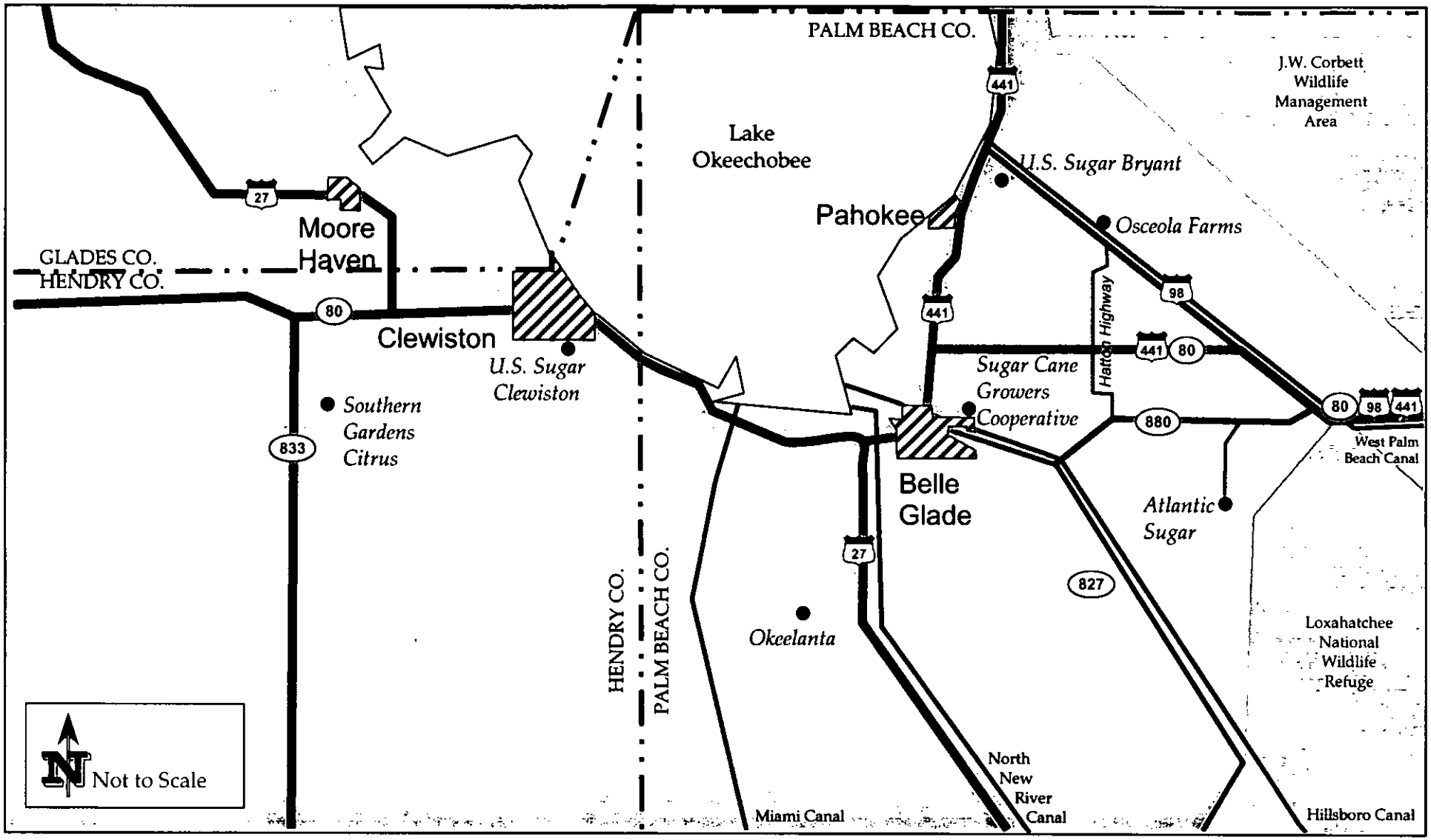
13. Risk Management Plan Verification:
    [ ] Plan previously submitted to Chemical Emergency Preparedness and Prevention Office (CEPPO). Verification of submittal attached (Document ID:_____) or previously submitted to DEP (Date and DEP Office:_____)
    [ ] Plan to be submitted to CEPPO (Date required:_____)
    [ ] Not Applicable

14. Compliance Report and Plan:
    [ ] Attached, Document ID:_____ [ ] Not Applicable

15. Compliance Certification (Hard-copy Required):
    [ ] Attached, Document ID:_____ [ ] Not Applicable

ATTACHMENT SG-FE-1

AREA MAP



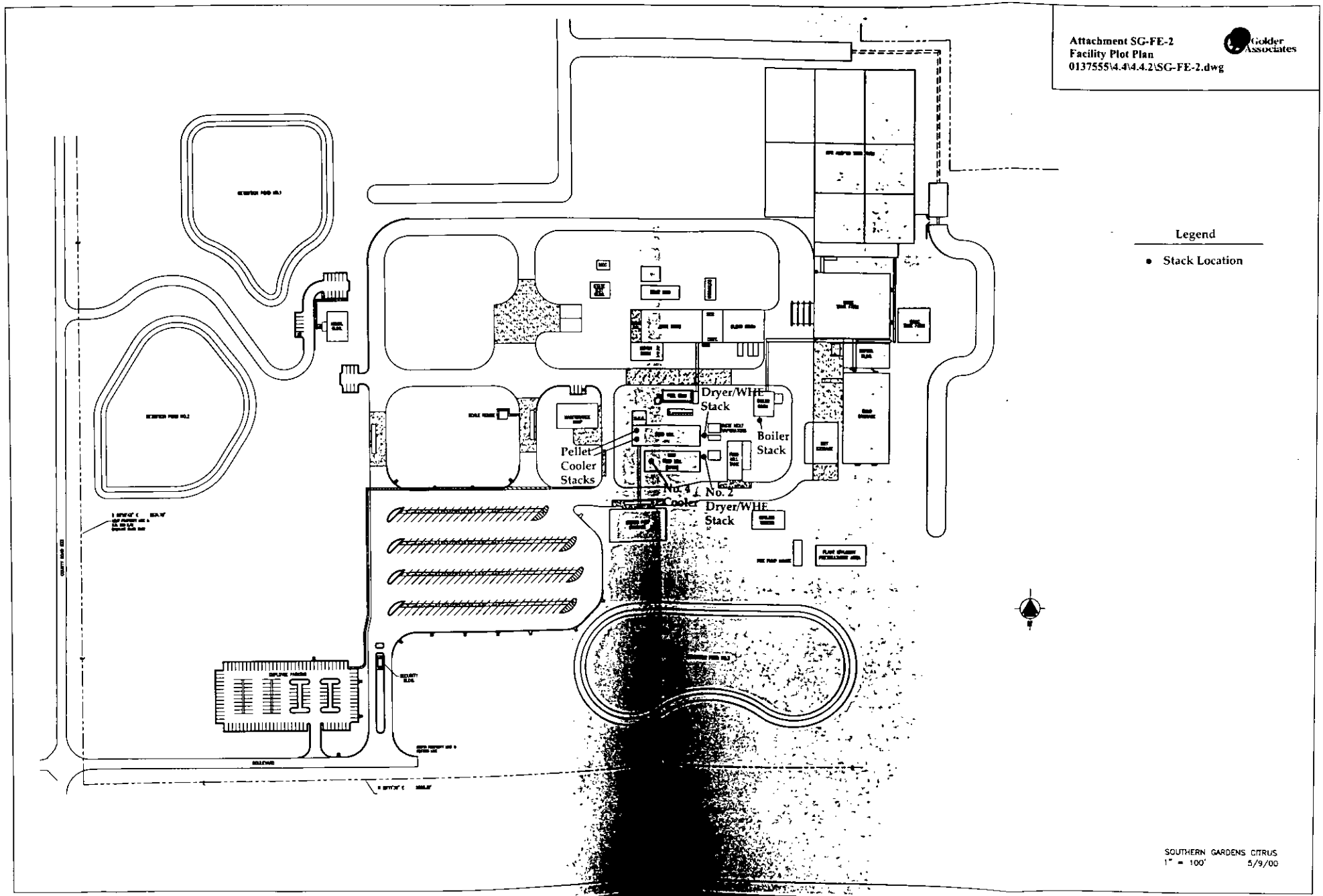
Attachment SG-FE-1
Location of Southern Gardens Citrus Processing Corporation

Source: Golder Associates Inc., 2001

Golder Associates

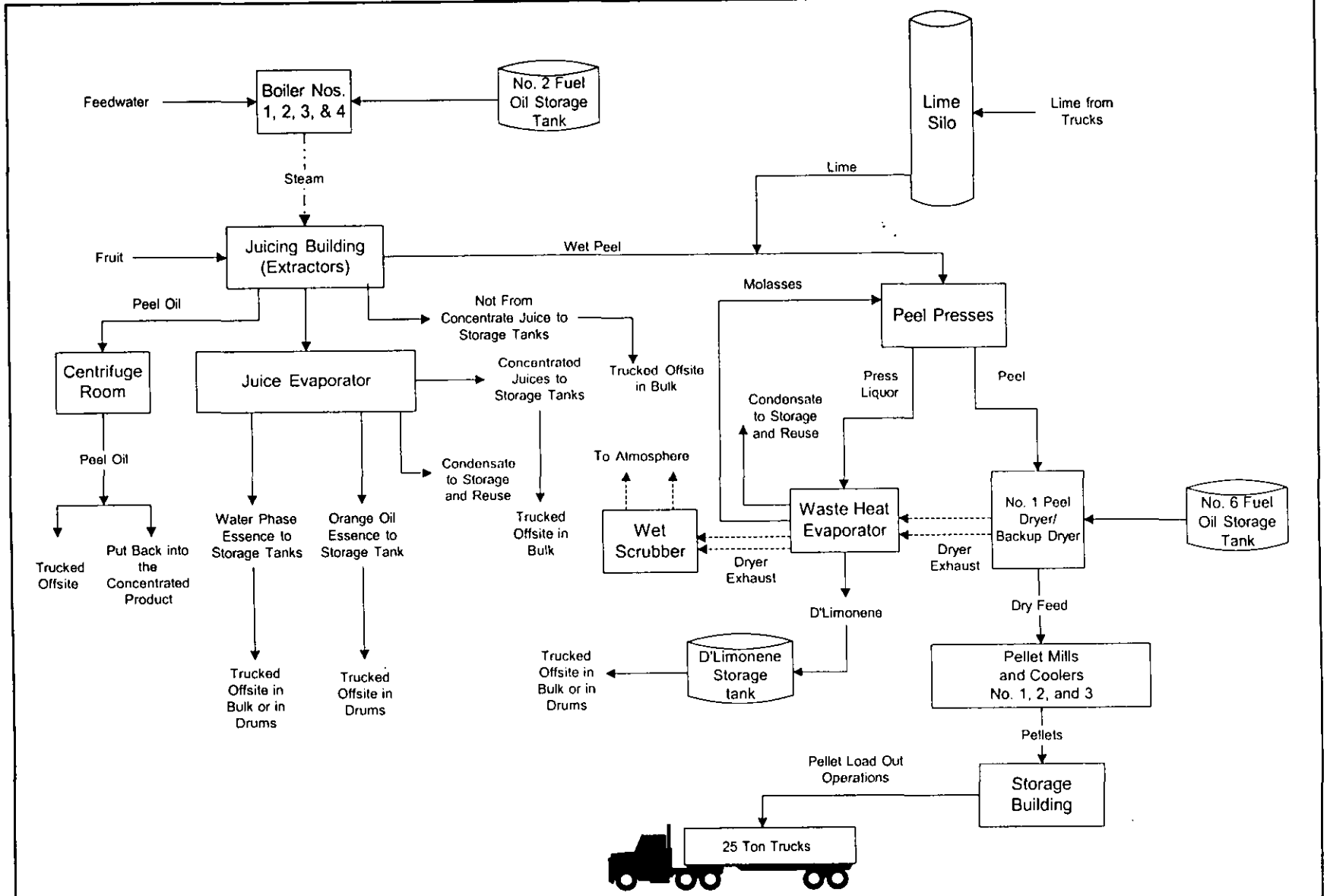
ATTACHMENT SG-FE-2

FACILITY PLOT PLAN


Attachment SG-FE-2
Facility Plot Plan
0137555\4.4\4.4.2\SG-FE-2.dwg
Golder Associates
Legend
Stack Location
Dryer/WHE Stack
Boiler Stack
Pellet Cooler Stacks
No. 1 Cooler
No. 2 Dryer/WHE Stack
SOUTHERN GARDENS CITRUS
1" = 100'
5/9/00

ATTACHMENT SG-FE-3

PROCESS FLOW DIAGRAM



Attachment SG-FE-3
Southern Gardens Citrus Processing Corporation
Process Flow Diagram with New Equipment
Clewiston, Florida

Process Area: Overall Plant Process

Filename: SG-FIGS.VSD

Latest Revision Date: 9/18/01

Process Flow Legend:
Solid / Liquid
Gas
Steam

Golder Associates

III. EMISSIONS UNIT INFORMATION

A separate Emissions Unit Information Section (including subsections A through J as required) must be completed for each emissions unit addressed in this Application for Air Permit. If submitting the application form in hard copy, indicate, in the space provided at the top of each page, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application.

A. GENERAL EMISSIONS UNIT INFORMATION
(All Emissions Units)

Emissions Unit Description and Status

1. Type of Emissions Unit Addressed in This Section: (Check one)

[X] This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).

[ ] This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.

[ ] This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.

2. Regulated or Unregulated Emissions Unit? (Check one)

[X] The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.

[ ] The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.

3. Description of Emissions Unit Addressed in This Section (limit to 60 characters):
Backup No. 2 Peel Dryer

4. Emissions Unit Identification Number:
ID:
[X] No ID
[ ] ID Unknown

5. Emissions Unit Status Code:	6. Initial Startup Date:	7. Emissions Unit Major Group SIC Code:	8. Acid Rain Unit?
C		20	[ ]

9. Emissions Unit Comment: (Limit to 500 Characters)

4-Digit SIC code = 2037. The emission unit consists of a 60,000 lb/hr water evaporation dryer fired with fuel oil containing a maximum sulfur content of 1.5 percent by weight.

Emissions Unit Control Equipment

1. Control Equipment/Method Description (Limit to 200 characters per device or method):

Wet scrubber – medium efficiency

2. Control Device or Method Code(s): 2

Emissions Unit Details

1. Package Unit: Manufacturer:	Model Number:	
2. Generator Nameplate Rating:	MW	
3. Incinerator Information:		
Dwell Temperature:		°F
Dwell Time:		seconds
Incinerator Afterburner Temperature:		°F

B. EMISSIONS UNIT CAPACITY INFORMATION
(Regulated Emissions Units Only)

Emissions Unit Operating Capacity and Schedule

1. Maximum Heat Input Rate:		84 mmBtu/hr
2. Maximum Incineration Rate:	lb/hr	tons/day
3. Maximum Process or Throughput Rate:		
4. Maximum Production Rate:	18.5 TPH BDP	
5. Requested Maximum Operating Schedule:		
	24 hours/day	7 days/week
	36 weeks/year	6,000 hours/year

6. Operating Capacity/Schedule Comment (limit to 200 characters):

Backup peel dryer will only operate when the existing peel dryer is shutdown.
BDP = Bone dry peel
1. **Max Prod. Rate represents dried citrus peel at 0% moisture.**
2. **Process or throughput varies depending upon moisture content of peel.**

See Attachment SG-EU1-B6.

C. EMISSIONS UNIT REGULATIONS
(Regulated Emissions Units Only)

List of Applicable Regulations

62-296.320(4)(a), F.A.C. Process Weight Table
62-296.320(4)(b), F.A.C. General Visible Emissions Standards
62-297.310, F.A.C. General Compliance Test Requirements
62-297.401(5), F.A.C. EPA Test Method 5
62-297.401(6), F.A.C. EPA Test Method 6
62-297.401(9), F.A.C. EPA Test Method 9
62-297.440(1)(b), F.A.C. Supplementary Test Procedures – ASTM D 396-76

D. EMISSION POINT (STACK/VENT) INFORMATION
(Regulated Emissions Units Only)

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram? **Dryers/WHE Stack**	2. Emission Point Type Code: **2**	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point):		
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common: **No. 1 Peel Dryer/WHE (EU ID 003)**		
5. Discharge Type Code: **V**	6. Stack Height: **125** feet	7. Exit Diameter: **5.7** feet
8. Exit Temperature: **175** °F	9. Actual Volumetric Flow Rate: **37,000** acfm	10. Water Vapor: %
11. Maximum Dry Standard Flow Rate: dscfm	12. Nonstack Emission Point Height: feet	
13. Emission Point UTM Coordinates: Zone: East (km): North (km):		
14. Emission Point Comment (limit to 200 characters): **The backup No. 2 Peel Dryer will be vented through the existing WHE and stack. The No. 1 Peel Dryer is also vented through this stack. The peel dryers can not operate simultaneously due to physical constraints of the waste heat evaporator.**		

E. SEGMENT (PROCESS/FUEL) INFORMATION
(All Emissions Units)

Segment Description and Rate: Segment 1 of 3

1. Segment Description (Process/Fuel Type) (limit to 500 characters): **Food and agricultural fuel fired equipment, process heaters, residual oil**		
2. Source Classification Code (SCC): **3-02-900-02**	3. SCC Units: **Thousand Gallons Burned**	
4. Maximum Hourly Rate: **0.560**	5. Maximum Annual Rate: **3,452**	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur: **1.5**	8. Maximum % Ash:	9. Million Btu per SCC Unit: **150**
10. Segment Comment (limit to 200 characters): **84.0 MMBtu/hr maximum firing No. 6 fuel oil (1.5% sulfur).**		

Segment Description and Rate: Segment 2 of 3

1. Segment Description (Process/Fuel Type) (limit to 500 characters): **Food and agriculture, Citrate Feed Manufacture: Handling and Transferring**		
2. Source Classification Code (SCC): **3-02-008-32**	3. SCC Units: **Tons of Product**	
4. Maximum Hourly Rate: **18.5**	5. Maximum Annual Rate: **90,000**	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment (limit to 200 characters): **Maximum and annual rates refer to bone dry peel.**		

E. SEGMENT (PROCESS/FUEL) INFORMATION
(All Emissions Units)

Segment Description and Rate: Segment 3 of 3

1. Segment Description (Process/Fuel Type) (limit to 500 characters):		
Food and Agriculture; Other Not Specified; Other Not Classified		
2. Source Classification Code (SCC): **3-02-999-99**	3. SCC Units: **Tons Produced**	
4. Maximum Hourly Rate: **11.95**	5. Maximum Annual Rate: **80,000**	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment (limit to 200 characters): **SCC units refer to tons of molasses produced. Hourly and annual rates refer to molasses production.**		

Segment Description and Rate: Segment ____ of ____

1. Segment Description (Process/Fuel Type) (limit to 500 characters):		
2. Source Classification Code (SCC):	3. SCC Units:	
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment (limit to 200 characters):		

F. EMISSIONS UNIT POLLUTANTS
(All Emissions Units)

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
PM	002		EL
PM_{10}	002		NS
SO_2			EL
NO_X			NS
CO			NS
VOC			NS
H115			NS
HAPs			NS

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units - Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: **PM**	2. Total Percent Efficiency of Control:
3. Potential Emissions: **32.05** lb/hour **96.15** tons/year	4. Synthetically Limited? [X]
5. Range of Estimated Fugitive Emissions: [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year	
6. Emission Factor: Reference: **See Att. SG-EU1-G8**	7. Emissions Method Code: **0**
8. Calculation of Emissions (limit to 600 characters): **See Attachment SG-EU1-G8. Emission factor based on Process Weight Formula 62-296.320(4)(a) F.A.C. E-17.31(P)$^{0.16}$ where P = 47 TPH. Actual process rates can vary up to 52 TPH pressed peel.**	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): **Hours of operation are limited to 6,000 hr/yr.**	

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: **RULE**	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: **Process weight formula**	4. Equivalent Allowable Emissions: **32.05** lb/hour **96.15** tons/year
5. Method of Compliance (limit to 60 characters): **EPA Method 5**	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): **Based on Process Weight Formula 62-296.320(4)(a) F.A.C.**	

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units - Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: **PM_{10}**	2. Total Percent Efficiency of Control:
3. Potential Emissions: **32.05** lb/hour **96.2** tons/year	4. Synthetically Limited? [X]
5. Range of Estimated Fugitive Emissions: [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year	
6. Emission Factor: **100% PM** Reference: **See Attachment SG-EU1-G8.**	7. Emissions Method Code: **0**
8. Calculation of Emissions (limit to 600 characters): **See Attachment SG-EU1-G8**	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): **Hours of operation are limited to 6,000 hr/yr.**	

Allowable Emissions Allowable Emissions ____ of ____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance (limit to 60 characters):	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):	

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units - Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: **SO_2**	2. Total Percent Efficiency of Control:
3. Potential Emissions: **42** lb/hour **126** tons/year	4. Synthetically Limited? [X]
5. Range of Estimated Fugitive Emissions: [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year	
6. Emission Factor: **0.5 lb/MMBtu** Reference: **See Attachment SG-EU1-G8**	7. Emissions Method Code: **0**
8. Calculation of Emissions (limit to 600 characters): **See Attachment SG-EU1-G8**	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):	

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: **OTHER**	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: **1.5% sulfur oil**	4. Equivalent Allowable Emissions: **42** lb/hour **126** tons/year
5. Method of Compliance (limit to 60 characters): **EPA Method 5**	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): **Based on permit condition for existing peel dryer. Emissions related to No. 6 fuel oil combustion.**	

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units - Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: **NO_X**	2. Total Percent Efficiency of Control:
3. Potential Emissions: **27.8** lb/hour **67.5** tons/year	4. Synthetically Limited? [X]
5. Range of Estimated Fugitive Emissions: [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year	
6. Emission Factor: **1.5 lb/ton BDP** Reference: **See Attachment SG-EU1-G8.**	7. Emissions Method Code: **0**
8. Calculation of Emissions (limit to 600 characters): **See Attachment SG-EU1-G8**	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): **Hours of operation are limited to 6,000 hr/yr.**	

Allowable Emissions Allowable Emissions _____ of _____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance (limit to 60 characters):	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):	

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units - Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: **CO**	2. Total Percent Efficiency of Control:
3. Potential Emissions: **1,789.0** lb/hour **3,370.4** tons/year	4. Synthetically Limited? [X]
5. Range of Estimated Fugitive Emissions: [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year	
6. Emission Factor: **74.90 lb/ton BDP** Reference: **See Att. SG-EU1-G8**	7. Emissions Method Code: **0**
8. Calculation of Emissions (limit to 600 characters): **See Attachment SG-EU1-G8**	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): **Hours of operation are limited to 6,000 hr/yr.**	

Allowable Emissions Allowable Emissions _____ of _____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance (limit to 60 characters):	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):	

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units - Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: **VOC**	2. Total Percent Efficiency of Control:
3. Potential Emissions: **1,118.1** lb/hour **2,106.5** tons/year	4. Synthetically Limited? [X]
5. Range of Estimated Fugitive Emissions: [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year	
6. Emission Factor: **46.81 lb/ton BDP** Reference: **See Att. SG-EU1-G8**	7. Emissions Method Code: **0**
8. Calculation of Emissions (limit to 600 characters): **See Attachment SG-EU1-G8**	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): **Hours of operation are limited to 6,000 hr/yr.**	

Allowable Emissions Allowable Emissions _____ of _____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance (limit to 60 characters):	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):	

H. VISIBLE EMISSIONS INFORMATION
(Only Regulated Emissions Units Subject to a VE Limitation)

Visible Emissions Limitation: Visible Emissions Limitation 1 of 1

1. Visible Emissions Subtype: **VE20**	2. Basis for Allowable Opacity: [X] Rule [ ] Other
3. Requested Allowable Opacity: Normal Conditions: **20** % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance: **EPA Method 9**	
5. Visible Emissions Comment (limit to 200 characters): **Rule 62-296.320(4)(b), F.A.C.**	

I. CONTINUOUS MONITOR INFORMATION
(Only Regulated Emissions Units Subject to Continuous Monitoring)

Continuous Monitoring System: Continuous Monitor 1 of 2

1. Parameter Code: **FLOW**	2. Pollutant(s): **NO_x**
3. CMS Requirement:	[ ] Rule [X] Other
4. Monitor Information: Manufacturer: **Custom Design** Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment (limit to 200 characters): **Measures total water flow to the scrubber nozzles to insure proper operation of the scrubber.**	

H. VISIBLE EMISSIONS INFORMATION
(Only Regulated Emissions Units Subject to a VE Limitation)

Visible Emissions Limitation: Visible Emissions Limitation ____ of ____

1. Visible Emissions Subtype:	2. Basis for Allowable Opacity: [ ] Rule [ ] Other
3. Requested Allowable Opacity: Normal Conditions: % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment (limit to 200 characters):	

I. CONTINUOUS MONITOR INFORMATION
(Only Regulated Emissions Units Subject to Continuous Monitoring)

Continuous Monitoring System: Continuous Monitor 2 of 2

1. Parameter Code: FLOW	2. Pollutant(s):
3. CMS Requirement:	[ ] Rule [X] Other
4. Monitor Information: Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment (limit to 200 characters): Monitors oil usage.	

J. EMISSIONS UNIT SUPPLEMENTAL INFORMATION
(Regulated Emissions Units Only)

Supplemental Requirements

1. Process Flow Diagram
   [X] Attached, Document ID: SG-EU1-J1 [ ] Not Applicable [ ] Waiver Requested
2. Fuel Analysis or Specification
   [X] Attached, Document ID: SG-EU1-J2 [ ] Not Applicable [ ] Waiver Requested
3. Detailed Description of Control Equipment
   [X] Attached, Document ID: SG-EU1-J3 [ ] Not Applicable [ ] Waiver Requested
4. Description of Stack Sampling Facilities
   [ ] Attached, Document ID:_____ [X] Not Applicable [ ] Waiver Requested
5. Compliance Test Report
   [ ] Attached, Document ID:_____
   [ ] Previously submitted, Date:_____
   [X] Not Applicable
6. Procedures for Startup and Shutdown
   [ ] Attached, Document ID:_____ [X] Not Applicable [ ] Waiver Requested
7. Operation and Maintenance Plan
   [ ] Attached, Document ID:_____ [X] Not Applicable [ ] Waiver Requested
8. Supplemental Information for Construction Permit Application
   [X] Attached, Document ID: Attachment A [ ] Not Applicable
9. Other Information Required by Rule or Statute
   [ ] Attached, Document ID:_____ [X] Not Applicable
10. Supplemental Requirements Comment:

Additional Supplemental Requirements for Title V Air Operation Permit Applications

11. Alternative Methods of Operation
[ ] Attached, Document ID:_____ [ ] Not Applicable

12. Alternative Modes of Operation (Emissions Trading)
[ ] Attached, Document ID:_____ [ ] Not Applicable

13. Identification of Additional Applicable Requirements
[ ] Attached, Document ID:_____ [ ] Not Applicable

14. Compliance Assurance Monitoring Plan
[ ] Attached, Document ID:_____ [ ] Not Applicable

15. Acid Rain Part Application (Hard-copy Required)

[ ] Acid Rain Part - Phase II (Form No. 62-210.900(1)(a))
Attached, Document ID:_____

[ ] Repowering Extension Plan (Form No. 62-210.900(1)(a)1.)
Attached, Document ID:_____

[ ] New Unit Exemption (Form No. 62-210.900(1)(a)2.)
Attached, Document ID:_____

[ ] Retired Unit Exemption (Form No. 62-210.900(1)(a)3.)
Attached, Document ID:_____

[ ] Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.)
Attached, Document ID:_____

[ ] Phase NOx Averaging Plan (Form No. 62-210.900(1)(a)5.)
Attached, Document ID:_____

[ ] Not Applicable

ATTACHMENT SG-EU1-B6

OPERATING CAPACITY/SCHEDULE COMMENT

ATTACHMENT SG-EU1-B6

Operating Capacity/Schedule Comment

The backup No. 2 Peel Dryer is designed for 60,000 lb/hr water evaporation rate. The process input rate and production rate are dependent upon the moisture content of the peel going into the dryer as well as the dried peel production. The No. 2 Peel Dryer will only operate as a backup to the No. 1 Peel Dryer.

ATTACHMENT SG-EU1-G8

CALCULATION OF EMISSIONS

Attachment SG-EU1-G8. Future Potential Emissions for No. 2 Peel Dryer at Southern Gardens Citrus Processing Corporation

Regulated Pollutant	Emission Factor	Reference	Short-Term Activity Factor [a]	Maximum Hourly Emissions (lb/hr)	Annual Activity Factor [b]	Annual Emissions (TPY)
Particulate (PM)	2.14 lb/ton BDP	1	--	32.05	90,000 tons/yr BDP	96.2
Particulate (PM_{10})	100% of PM	2	--	32.05	90,000 tons/yr BDP	96.2
Sulfur dioxide	0.5 lb/MMBtu	3	84.0 MMBtu/hr	42.0	504,000 MMBtu/yr	126.0
Nitrogen oxides	1.5 lb/ton BDP	4	18.5 tons/hr BDP	27.8	90,000 tons/yr BDP	67.5
Carbon monoxide						
Early/Mids	58.21 lb/ton BDP	5	18.5 tons/hr BDP	1,077.0	--	--
Valencia	96.70 lb/ton BDP	5	18.5 tons/hr BDP	1,789.0	--	--
Annual Average	74.90 lb/ton BDP	5	--	--	90,000 tons/yr BDP	3,370.4
VOC						
Early/Mids	36.38 lb/ton BDP	6	18.5 tons/hr BDP	673.1	--	--
Valencia	60.44 lb/ton BDP	6	18.5 tons/hr BDP	1,118.1	--	--
Annual Average	46.81 lb/ton BDP	6	--	--	90,000 tons/yr BDP	2,106.5

Footnotes:

[a] Proposed maximum heat input rate and throughput rate.

[b] Based on 84 MMBtu/hr and 6,000 hours per year or 20 million boxes per year and 9.0 lb BDP/box.

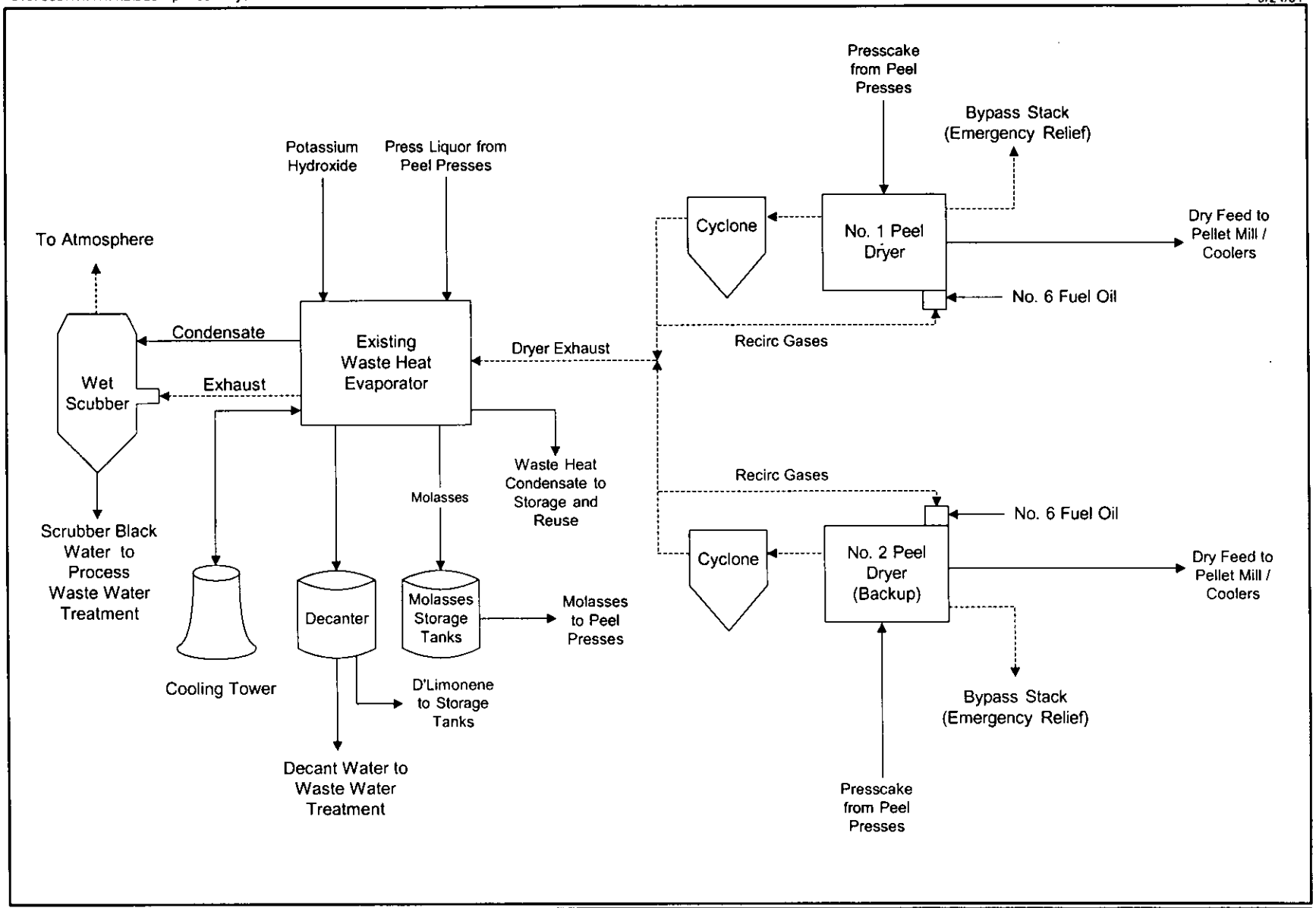
BDP = bone dry peel

References:

1. Maximum emission based on Process Weight Formula, $E = 17.31P^{0.16}$, where E is in lb/hr and P = 47 TPH throughput rate (actual rates up to 52 TPH). Resulting E was divided by 90,000 tons/yr BDP to convert into lb/ton BDP.
2. Conservative assumption.
3. Based on existing limit for No. 1 Peel Dryer.
4. Maximum emissions based on No. 1 Peel Dryer stack test data.
5. Based on 160% of VOC emissions, derived from No. 1 Peel Dryer stack test data.
6. Emission factor based on General FCPA Emission Factor, maximum production rates and:
   Early/Mids -- 0.4548 lb oil/box and a hourly minimum of 50% oil recovery.
   Valencia -- 0.7555 lb oil/box and a hourly minimum of 50% oil recovery.
   Annual average emission factor back calculated from VOC emissions calculated in Table 2-1. Annual average of 50% oil recovery.
   Based on 90 lb fruit/box; 9.0 lb BDP/box; 72% of oil to dryer emitted from dryer stack.

ATTACHMENT SG-EU1-J1

PROCESS FLOW DIAGRAM



Attachment SG-EU1-J1
Southern Gardens Citrus Processing Corporation
Process Flow Diagram
Clewiston, Florida

Process Area: Backup No. 2 Peel Dryer Evaporator

Filename: SG-FIGS.VSD

Latest Revision Date: 9/24/01

Process Flow Legend:
Solid / Liquid
Gas
Steam

Golder Associates

ATTACHMENT SG-EU1-J2

FUEL ANALYSIS OR SPECIFICATION

ATTACHMENT SG-EU1-J2

Fuel Analysis Specification for Southern Gardens Citrus Processing Corporation Backup No. 2 Peel Dryer

Parameter	No. 6 Fuel Oil
Density (lb/gal)	7.94
Heating Value (Btu/lb)	18,400
Heating Value (Btu/gal)	150,000 - 152,000
Nitrogen (%)	0
Sulfur (%)	1.5 Max
Ash/Inorganic (%)	0

ATTACHMENT SG-EU1-J3

DETAILED DESCRIPTION OF CONTROL EQUIPMENT

Attachment SG-EU1-J3

Southern Gardens Citrus Processing Corporation
Backup No. 2 Peel Dryer/Existing Waste Heat Evaporator Wet Scrubber Parameters [a]

Outlet Gas Temp (F)	175
Outlet Gas Flow Rate (ACFM)	37,000
Pressure Drop Across Device (inches of H2O) Min/Max	4 / 7
Scrubbant Flow Rate (gal/min) - Normal	>200
Scrubbant Supply Pressure (psi) - Normal/Maximum	40 / 32
Average Scrubbant pH	4
Scrubbant Make-up Rate (specify units)	70 gpm
Scrubber Inlet Loading Rate (lb/hr) of PM	641

Pollutants

	Inlet Loading lb/hr	Outlet Loading lb/hr	Control Efficiency (%)
Particulate Matter	641	32.05	95

Footnotes:

[a] Based on parameters for existing equipment controlling emissions at the existing Citrus Feed Mill.

ATTACHMENT A

TABLE OF CONTENTS

Attachment A

1.0 INTRODUCTION

Southern Gardens Citrus Processing Corporation (SGCPC) is a citrus processing facility located in Hendry County, west of Clewiston (see application form, Attachment SG-FE-1). This air construction permit application is requesting authorization to install a used citrus peel dryer as a backup to the existing peel dryer.

The SGCPC facility was originally permitted in June 1992 and began initial operations in January 1994. SGCPC currently holds a Title V Operating Permit (Permit No. 0510015-004-AV). Emissions units included in the Title V permit include four process steam boilers, a citrus peel dryer/waste heat evaporator (WHE), two pellet mills and three pellet coolers, a lime silo, four fuel oil storage tanks, three d-limonene storage tanks, and other insignificant emissions units.

SGCPC recently had an opportunity to purchase a used peel dryer at a favorable price from another citrus processing facility. SGCPC has purchased the used dryer, and now desires to bring it to the SGCPC plant site and install the dryer. The relocated peel dryer (identified as the No. 2 Peel Dryer) is the same capacity as the existing peel dryer (identified as the No. 1 Peel Dryer). The No. 2 Peel Dryer will be connected to the existing WHE and be used only as a backup to the No. 1 Peel Dryer. An additional WHE or pellet mill/cooler will not be purchased or installed at this time. This report contains a project description and a regulatory analysis for this project.

A plot plan of the SGCPC facility showing the location of the new equipment is presented in Attachment SG-FE-2. An overall process flow diagram is presented in Attachment SG-FE-3.

All permit limitations currently existing for the No. 1 Peel Dryer, including boxes of fruit throughput, operating hours and fuel restrictions, will apply to the backup No. 2 Peel Dryer. As such, no emissions increase will occur due to the operation of the backup dryer.

2.0 PROJECT DESCRIPTION

2.1 EXISTING OPERATIONS

The SGCPC facility currently has a total of thirty-nine (39) citrus juice extractors, one citrus feed mill, two pellet mills with three pellet coolers, four steam boilers, and seven volatile organic liquid (VOL) storage tanks. The facility includes other equipment such as juice evaporators and refrigerated juice storage tanks to process the citrus juice into saleable products. An air construction and prevention of significant deterioration (PSD) permit (permit no. 0510015-007-AC/PSD-FL-299) was issued in December 2000 for the addition of three new extractors, adding to the existing 36 extractors. The PSD permit limited the total fruit processing capacity of the facility to 20 million boxes of fruit per year.

The citrus feed mill at the SGCPC facility consists of one 60,000 lb/hr (water evaporation rate) peel dryer and one 135,000 lb/hr (water evaporation rate) WHE. The maximum bone dry peel (BDP) input rate through the citrus feed mill is 18.5 tons per hour (TPH). Pressed peel input rates and dried peel production rates can vary based on the moisture content of the pressed peel and dried peel. The maximum heat input rate is 84.0 million British thermal units per hour (MMBtu/hr). SGCPC burns No. 6 fuel oil with a maximum sulfur content of 1.5 percent in the dryer. A wet scrubber serves as control equipment. The peel dryer is permitted to operate up to 6,000 hours per year.

2.2 PROPOSED CHANGES TO FACILITY

SGCPC is proposing to install a used dryer from another citrus facility solely as a backup to the existing peel dryer. The proposed peel dryer will essentially be identical to the existing dryer, and will have the capacity to evaporate 60,000 lbs water per hour with a maximum heat input of 84.0 MMBtu/hr. The dryer will be fired with No. 6 fuel oil with a maximum sulfur content of 1.5 percent. The maximum peel production rate of the proposed dryer is 18.5 tons of bone dry peel (BDP) per hour. The No. 2 Peel Dryer will be connected to the existing WHE and will operate solely as a backup to the No. 1 Peel Dryer. Due to the physical limitations associated with the existing WHE, both dryers will not be operated simultaneously. The operation of the existing dryer and backup dryer combined will not exceed 6,000 hours per year.

2.3 AIR EMISSIONS

The future maximum emissions from the No. 2 Peel Dryer are presented in Attachment SG-EU1-G8. Since the dryers are similar, the potential emissions of the No. 2 Peel Dryer are the same as the potential emissions of the No. 1 Peel Dryer. Note that these emissions reflect all 20 million boxes of fruit per year being processed solely through the backup No. 2 Peel Dryer. These emissions would only occur if the No. 2 Peel Dryer processed all of the fruit received at the facility. In reality, the backup No. 2 Peel Dryer will be used solely as a backup unit, and the combined total emissions from both peel dryers will not exceed those shown in Attachment SG-EU1-G8.

The future potential emissions of the No. 2 Peel Dryer are based on 20 million boxes per year; 84.0 MMBtu/hr and 6,000 hours of operation per year. Maximum potential volatile organic compound (VOC) emissions were calculated using a mass balance method. This VOC mass balance is presented in Table 2-1.

Please note that the amount of available oil in the fruit, and the amount of citrus peel per box of fruit, processed by SGCPC during the most recent crop season was the highest of any season since SGCPC commenced operations in 1994. As a result, the potential emissions of VOC reported in this application are higher than those reported in last year's PSD permit application for the installation of three new extractors. Potential emissions of CO showed a similar increase because CO emissions are directly tied to VOC emissions. The apparent increases in potential emissions of VOC and CO are not attributable in any way to the proposed installation of a backup peel dryer and do not reflect any change in SGCPC's facility or processing methods.

The addition of the No. 2 Peel Dryer will not affect any emissions units upstream or downstream. There will not be a change in emissions with this project since the backup No. 2 Peel Dryer will only operate when the No. 1 Peel Dryer is not operating. The combined hours of operation for the peel dryers will not exceed the No. 1 Peel Dryer's current limit of 6,000 hours during any consecutive 12 months.

3.0 RULE APPLICABILITY

3.1 APPLICABILITY OF MACT REGULATIONS

Regulations pertaining to major sources of hazardous air pollutants (HAPs) are contained in 40 CFR Part 63. These regulations require that major sources of HAPs apply maximum achievable control technology (MACT). The EPA has promulgated MACT regulations for a number of source categories to date. These regulations require implementation of MACT for new sources prior to startup, and for existing sources by the deadlines set for each source category. For new or reconstructed major sources of HAPs in source categories for which EPA has not yet promulgated MACT regulations, a case-by-case determination of MACT is required (40 CFR 63.42(c)) prior to beginning construction.

SGCPC is proposing to relocate an existing citrus peel dryer to its Clewiston facility. Recently, EPA proposed to clarify 40 CFR Part 63 in regards to the effect of relocating an existing source subject to MACT (Federal Register, March 23, 2001, pg. 16317). The issue was whether or not a relocated source is "constructed", and thus subject to new source MACT. EPA proposed to amend 40 CFR 63.2 by adding: "Construction does not include the removal of all equipment comprising an affected source from an existing location and reinstallation of such equipment at a new location. However, removal and reinstallation of an affected source will be construed as reconstruction if it satisfies the criteria for reconstruction as set forth below." SGCPC is relocating a portion of a process or production unit- the peel dryer. The entire citrus processing facility is not being relocated. Thus, SGCPC is installing only a piece of a process or production unit, and not an entire unit.

Reconstruction is defined in 40 CFR 63.41 as the replacement of components at an existing production unit such that the fixed capital cost of the new components exceeds 50 percent of the fixed capital cost to construct a comparable new production unit. The relocated No. 2 Peel Dryer will not trigger reconstruction under these regulations.

Based on the above analyses, new source MACT will not apply to the relocated peel dryer. Existing source MACT will apply to the No. 2 Peel Dryer if and when EPA promulgates such regulations.

3.2 PSD APPLICABILITY

The backup No. 2 Peel Dryer will be used solely as a backup to the existing No. 1 Peel Dryer. There will not be any increase in emissions due to this project since the potential emissions will not exceed the current potential emissions. Therefore, PSD review is not applicable to this project.