


Florida Department of
Environmental Protection

Memorandum

To: Al Linero
From:  Joe Kahn
Date: August 20, 2001
Re: Southern Gardens
Application for Addition of Second Peel Dryer and Fourth Pellet Cooler
0510015-008-AC

This project involves the addition of a second citrus peel dryer and fourth pellet cooler at an existing citrus juice processing plant. The application states that this project is not subject to PSD, and the applicant requested a determination of non-applicability. The application was received on July 9, 2001 and a request for additional information was sent on August 8th. Because the application purports to not be subject to PSD no letters requesting comment from EPA and NPS/FWS were sent. No comments were received from the district office.

As part of this application, the applicant is requesting a relaxation of the fruit processing limit of the PSD permit issued for a previous plant expansion, so the relationship of this request to that previous expansion project is one of the outstanding issues. The major issues noted in the request for additional information were related to the issue of PSD applicability, although the applicant was given the choice of alternatively requesting the Department issue a minor source permit pursuant to the MOU with the FCPA, without addressing the issue of PSD applicability. Please read the request for additional information carefully as it outlines this choice. I discussed the request for additional information with David Buff on August 13th, and can provide information about our discussion if you wish.

Status: Awaiting additional information.



Jeb Bush
Governor

Department of Environmental Protection

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

David B. Struhs
Secretary

August 8, 2001

Certified Mail – Return Receipt Requested

Mr. Tristan Chapman
Vice President and General Manager.
Southern Gardens Citrus Processing Corporation
Post Office Box 130
Clewiston, Florida 33440

Re: Request for Additional Information
DEP File No. 0510015-008-AC
No. 2 Citrus Peel Dryer/WHE and No. 4 Pellet Cooler

Dear Mr. Chapman:

On July 9, 2001 the Department received your application and complete fee for an air construction permit for the addition of a second citrus peel dryer/waste heat evaporator combination and a fourth pellet cooler, and associated appurtenances at the existing citrus juice processing facility. The application is incomplete. In order to continue processing your application, the Department will need the additional information requested below. Should your response to any of the below items require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the application form.

The application was primarily based upon the limits required under the citrus legislation, but the application included a request for review of PSD applicability. However, the current memorandum of understanding (MOU) between the Department and the Florida Citrus Processors Association does not provide for the Department making a determination of PSD non-applicability when processing applications pursuant to the requirements of the legislation. To continue processing this application, you must choose the manner in which you wish the Department's review to proceed. Respond by providing the information requested by either item 1 or 2 below.

1. In order to address your request for a determination regarding PSD applicability, please provide all information necessary to make such a determination. The application included a comparison of the current allowable emissions to the future potential emissions, but this comparison did not meet the requirements, and did not provide sufficient detail, for a PSD applicability analysis. Note that the facility has begun normal operations, even if it does not have a two year period of operation at the current processing capacity of 20 million boxes per year. Please include as a minimum:

- Past actual emissions for the previous five year period with all supporting information;
- All supporting information for the estimated future potential emissions, including a material balance for citrus peel oil;
- A complete discussion of the relationship of the previous expansion project to the current expansion request;
- A complete discussion of the company's plans for further expansion within the near future;
- An analysis of the processing capacity of the existing and proposed production equipment, from fruit receiving and handling through juice and byproduct production and feed mill operations;

"More Protection, Less Process"


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- An analysis of equipment bottlenecks and the relationship of those bottlenecks to future production capacity and expansion plans;
- Information to support the capacities of the proposed dryer and WHE (note that the Title V permit for the facility which previously used the equipment shows a dryer design input capacity of 36 TPH and an output capacity of 12 TPH at 10 percent moisture, and two WHE units associated with that dryer with design evaporative capacities of 50,000 and 60,000 lb/hr);
- A summary or chart of the range of process input weights of pressed peel at possible moisture percentages, based on the evaporative capacity of the proposed dryer and the proposed production rate of 18.5 tons per hour of BDP (note that the application shows a process input weight of 47 tons per hour of pressed peel);
- Supporting information for the production factor of 8.2 lb BDP per box of fruit;
- Supporting information for the inlet loading used in the control efficiency calculation of attachment SG-EU1-J3; and,
- The increase in potential HAP emissions associated with this project.

2. Alternatively, you must confirm that you are requesting that the Department process your application pursuant to the requirements of section 403.08725, Florida Statutes, per the MOU. You may also specify any additional requirements you wish to have incorporated into the construction permit that you believe may be necessary to prevent your project from being subject to PSD, in the event that the statutory requirements do not apply in the future as a result of EPA's review of those requirements. If you pursue this option, the Department will not make any determination of PSD applicability as part of processing this application. Note that the statute regulates PM₁₀ and PM as one pollutant, so the process weight limitation of Rule 62-296, F.A.C., will not apply with this option.

The Department will resume processing your application after receipt of the requested information. Rule 62-4.050(3), F.A.C. requires that all applications for a Department permit must be certified by a professional engineer registered in the state of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. Material changes to the application should also be accompanied by a new certification statement by the authorized representative or responsible official. Permit applicants are advised that Rule 62-4.055(1), F.A.C. now requires applicants to respond to requests for information within 90 days. If there are any questions, please call me at 850/921-9509.

Sincerely,



Joseph Kahn, P.E., Administrator
Emissions Monitoring Section
Bureau of Air Monitoring
and Mobile Sources

/jk

cc: Mr. David Buff, P.E., Golder Associates Inc.
Mr. Ron Blackburn, South District

SENDER

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

MR TRISTAN CHAPMAN
VICE PRESIDENT & GEN MANAGER
SOUTHERN GARDENS CITRUS PROC. CORP.
POST OFFICE BOX 130
CLEWISTON FLORIDA 33440

ACTION ON DELIVERY

A. Received by (Please Print Clearly)

B. Date of Delivery

8-10-01

C. Signature

x *Andrea Salo*☐ Agent☐ AddresseeD. Is delivery address different from item 1? ☐ YesIf YES, enter delivery address below: ☐ No

3. Service Type

☒ Certified Mail ☐ Express Mail☐ Registered ☐ Return Receipt for Merchandise☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee)

☐ Yes

2. Article Number (Copy from service label)

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