



Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

December 1, 2000

Mr. Tristan Chapman
VP and General Manager
Southern Gardens Citrus Processing Corp.
PO Box 130
Clewiston, Florida 33440

Re: Methodologies for Citrus Oil Material Balance and Dryer Throughput Material Balance
Permit PSD-FL-299, 0510015-007-AC

Dear Mr. Chapman:

We have reviewed a letter dated November 16, 2000 from David Buff, P.E., of Golder Associates Inc. proposing methodologies for determining oil contents pursuant to specific condition 28 in Section II of permit number PSD-FL-299. Mr. Buff proposed measuring the oil contents of incoming fruit and dried pellets on a twice per week basis, and using the average of those two results to determine the daily mass of oil in those materials until the next week's average is determined. The oil contents will be determined using the Braddock sample preparation method and the Scott Oil method, as described in the attachment to that letter. The amount of dried pellets produced each day will be estimated from the measured weight of pellets loaded out each day from the pellet warehouse. We agree with the sampling and analysis methods proposed with the exception of the sampling frequency of incoming fruit. We believe that the oil content of incoming fruit should be determined on a daily basis, at least for the first fruit season. After this first season, Southern Gardens may compare the weekly averages obtained from daily measurements with the averages that would be obtained using two specific days each week, and if there is no significant difference, may propose to reduce the frequency to two days per week for the subsequent processing seasons. Approval of that change would be by letter from the Department's Division of Air Resource Management.

The letter also proposed a material balance to demonstrate compliance with the daily average peel dryer throughput limitation of specific condition 2 and averaging requirement of specific condition 4 of Section III, Subsection B. Daily throughput of pressed peel would be estimated by measuring the dried pellets loaded out each day from the pellet warehouse, and relating pellet production to pressed peel throughput using the moisture contents of the pressed peel and dried pellets measured on a daily basis. This methodology appears satisfactory.

Please contact me at 850-921-9519 if you have any questions about the above.

Sincerely,

Joseph Kahn, P.E.
New Source Review Section

/jk

cc: Ron Blackburn, DEP SD (w/ copy of Golder letter)
David Buff, P.E., Golder Associates Inc.

"More Protection. Less Prices."

Golder Associates Inc.

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

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**Golder
Associates**

DEC 01 2000

November 30, 2000

BUREAU OF AIR REGULATION

0037568A/02

Mr. Cleveland Holladay
Bureau of Air Quality Management
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400

RE: REVISED MODELING ANALYSIS FOR SOUTHERN GARDENS CITRUS

Dear Cleve:

This purpose of this letter is to address the air modeling issues for this facility that were mentioned in the second part of U.S. Environmental Protection Agency's (EPA's) letter to A.A. Linero dated November 15, 2000, and Golder received a copy.

Response to Questions 1 and 2.

The permit application emission rate tables are the same as those provided in Section 2.0 of the Prevention of Significant Deterioration (PSD) report. The maximum emission rates used in the air modeling analysis will match the emission rates provided in the Section 2.0 tables. Table 6-2 has some incorrect PM₁₀ and CO emission rates for both the peel dryer/WHE and the pellet coolers. For the dryer, the future maximum PM₁₀ emission rate should be 4.04 grams per second (g/s), which matches Table 2-4. The CO emission rate should be 191.81 g/s, also matching the CO emission rate in Table 2-4. For the pellet coolers, the PM₁₀ emission rate should be 0.63 g/s, matching Table 2-5. The air modeling analysis used the correct emission rates. Though not used in the air modeling analysis, some of the annual [tons per year (TPY)] emission rates were also corrected to match the values presented in Section 2.0 and the permit application.

2c. The dryer and pellet coolers future operation was extended from 7 to 9 months in all the air modeling analyses to account for up to 6,000 hours of operation for those units. This affected all of the air modeling files and as a result, all of these files were rerun. As a result of this change, the results in Tables 7-1, 7-3, 7-4, and 7-5 were also revised and are attached. The revised air modeling files have been electronically transferred separately to the Department. It should be noted that Table 7-2 did not require updating because the CALPUFF modeling analysis assumed full year operation for all modeled sources.

3. A figure of the fenced property line is attached. The property is entirely fenced with a guard house at the entrance.

4. All refined maximum predicted impacts presented in the report were resolved to less than 100-meter (m) receptor spacing along the fence line and to 100 m or less resolution beyond the fence line.

5. Please see the response to Question 2c.

6a. Please see the response to Question 1.

6b. The emission rates used in the visibility modeling analysis are correct. The visibility results presented in Section 8.3.8 of the PSD report are not. The first sentence of the results section should read as follows: " The maximum predicted change in visibility of 1.04 percent (0.104 deciview) is well below the criteria of 5.0 percent (0.5 deciviews)".

Please feel free to contact me if you have additional questions or if I can be of further assistance.

Sincerely,

GOLDER ASSOCIATES, INC



Steven R. Marks, CCM
Senior Meteorologist

Attachments

SRM/nav

cc: David Buff, Golder

P:\Projects\2000\037\0037568a Southern Gardens\02-srm submitted by e-mail\02ltr.doc

Table 6-2. Short-term and Annual Emissions used in Modeling of SGPCPC

	Short-term Emissions				Long Term Emissions ^a				
	Current		Future		Current		Future		
	lb/hr	g/s	lb/hr	g/s	TPY	g/s	TPY	g/s	
	Boilers				Boilers				
PM ₁₀	0.79	0.10	0.79 ^b	0.10	PM ₁₀	0.71 ^e	0.02	2.04 ^b	0.06
SO ₂	54.64	6.88	54.64 ^b	6.88	SO ₂	20.79 ^e	0.60	140.69 ^b	4.04
NO _x	15.81	1.99	15.81 ^b	1.99	NO _x	14.28 ^e	0.41	40.78 ^b	1.17
CO	3.95	0.50	3.95 ^b	0.50	CO	3.57 ^e	0.10	10.20 ^b	0.29
	Peel Dryer/WHE				Peel Dryer/WHE				
PM ₁₀	11.30 ^f	1.42	32.05 ^c	4.04	PM ₁₀	13.73 ^e	0.39	96.2	2.77
SO ₂	19.62 ^f	2.47	42.00 ^c	5.29	SO ₂	20.49 ^e	0.59	126.0	3.62
NO _x	10.40 ^f	1.31	27.70 ^c	3.49	NO _x	10.87	0.31	61.5	1.77
CO	339.00 ^f	42.71	1522.30 ^c	191.81	CO	625.8	17.99	2882	82.84
	Pellet Coolers				Pellet Coolers				
PM ₁₀	0.19 ^f	0.02	5.00 ^d	0.63	PM ₁₀	0.36	0.01	15.00	0.43

^a From Table 2-2 Summary of Emissions, .

^b Table 2-6. Future Potential Emissions for Boiler Nos. 1, 2, 3, and 4.

^c Table 2-3. Future Potential Emissions for Citrus Feed Mill

^d Table 2-4. Future Potential Emissions for Citrus Pellet Mill

^e Actual emissions are an average of the 1998-1999 AOR emissions.

^f Data from 4/18/2000 stack test.

Table 7-1. Maximum Predicted Pollutant Impacts for the Project Only at SGCPC

Averaging Time	Concentration ^a (ug/m ³)	Receptor Location ^b		Time Period (YYMMDDHH)	EPA Significant Impact Level (ug/m ³)
		Direction (degree)	Distance (m)		
SO₂					
Annual	0.4	190	1000	87123124	1
	0.4	240	1000	88123124	
	0.3	250	700	89123124	
	0.6	^c 244	900	90123124	
	0.5	^c 244	1000	91123124	
HIGH 24-Hour	5.9	180	1000	87100824	5
	5.7	190	1000	88020624	
	7.4	^c 320	1100	89101124	
	6.6	230	500	90051124	
	5.1	290	600	91052824	
HIGH 3-Hour	19.7	180	400	87032112	25
	18.5	230	500	88102612	
	20.3	290	500	89061815	
	19.2	302	535	90050212	
	20.2	210	500	91101015	
PM₁₀					
Annual	1.7	180	227	87123124	1
	1.7	120	359	88123124	
	1.6	120	359	89123124	
	1.5	240	482	90123124	
	1.4	240	482	91123124	
HIGH 24-Hour	25.8	170	229	87100824	5
	21.5	180	227	88020624	
	22.5	120	359	89103024	
	20.8	100	316	90011224	
	24.8	120	359	91122924	
NO_x					
Annual	0.4	190	1000	87123124	1
	0.4	240	1000	88123124	
	0.4	304	600	89123124	
	0.6	^c 242	800	90123124	
	0.5	240	1000	91123124	
CO					
HIGH 8-Hour	964.1	190	600	87100616	500
	956.8	240	600	88102816	
	963.6	320	1000	89101116	
	863.7	230	500	90051116	
	1151.9	200	500	91101016	
HIGH 1-Hour	1791.1	240	482	87102013	2,000
	1879.5	70	700	88102314	
	1907.7	312	610	89100614	
	1934.5	306	600	90101414	
	1895.6	300	524	91100414	

^a Based on 5-year meteorological record, Fort Myers/Ruskin, 1987-91

^b Relative to Southeast corner of Feed Mill building

^c Refined values

Note: YYMMDDHH = Year, Month, Day, Hour Ending
 High = Highest Concentration in 5 years.

Table 7-3. Maximum Predicted Pollutant Impacts Due to All Future Modeled Sources
 AAQS Screening Analysis, SGCP

Averaging Time	Concentration ^a (ug/m ³)	Receptor Location ^b		Time Period (YYMMDDHH)
		Direction (degree)	Distance (m)	
<u>SO₂</u>				
Annual	4.4	110	331	87123124
	5.5	110	331	88123124
	4.9	110	331	89123124
	5.9	240	700	90123124
	5.4	240	700	91123124
HSH 24-Hour	50.4	110	331	87010124
	49.3	110	331	88050624
	43.7	110	331	89050224
	34.5	110	331	90102524
	77.9	110	331	91030424
HSH 3-Hour	143.3	110	331	87031012
	159.4	110	331	88070115
	151.2	100	316	89051118
	156.5	100	316	90011215
	167.7	110	331	91030415
<u>PM₁₀</u>				
Annual	2.3	180	227	87123124
	2.4	120	359	88123124
	2.3	120	359	89123124
	2.6	240	482	90123124
	2.4	240	482	91123124
HSH 24-Hour	24.4	170	229	87030424
	22	120	359	88050624
	18.7	120	359	89050624
	21.3	90	311	90010924
	21.3	120	359	91021124
<u>CO</u>				
H2H 8-Hour	786.1	180	500	87022316
	719.2	240	700	88032816
	753.5	190	500	89052716
	840.9	250	500	90032416
	1029.2	210	500	91101116
H2H 1-Hour	1971.4	360	2000	87120205
	2051.3	230	400	88052011
	2067.1	190	400	89061111
	1998.7	160	300	90061714
	2114.8	120	359	91063012

^a Based on 5-year meteorological record, Fort Myers/Ruskin, 1987-91

^b Relative to Southeast corner of Feed Mill building

Note: YYMMDDHH = Year, Month, Day, Hour Ending
 H2H = Highest, 2nd-Highest Concentration in 5 years.

Table 7-4. Maximum Refined Impacts as Compared to AAQS, SGPCP

Averaging Time/ Pollutant	Concentration (ug/m ³)			Receptor Location		Period Ending (YYMMDDHH)	Florida AAQS (ug/m ³)
	Total	Contributed from		Direction (degrees)	Distance (m)		
		Modeled	Background				
<u>SO₂</u>							
Annual	11.0	6.0	5	242	800	90123124	60
HSH 24-hour	90.9	77.9	13	110	331	91030424	260
HSH 3-hour	215	168	47	110	331	91030415	1,300
<u>PM₁₀</u>							
Annual	25.6	2.6	23	240	482	90123124	50
HSH 24-hour	62.4	24.4	38	170	229	87100324	150
<u>CO</u>							
H2H 8-Hour	4,362	1,029	3,333	210	500	91101116	10,000
H2H 1-Hour	7,670	2,115	5,555	120	359	91063012	40,000

Table 7-5. Maximum Predicted Pollutant Impacts Due to All Future Modeled Sources
PSD Class II Screening Analysis, SGCP

Averaging Time	Concentration ^a (ug/m ³)	Receptor Location ^b		Time Period (YYMMDDHH)
		Direction (degree)	Distance (m)	
SO₂				
Annual	1.8	110	331	87123124
	2.6	110	331	88123124
	2.1	110	331	89123124
	2	240	700	90123124
	1.3	240	1000	91123124
HSH 24-Hour	49.2	110	331	87010124
	49.3	110	331	88050624
	43.2	110	331	89050224
	34.5	110	331	90102524
	77.2	110	331	91030424
HSH 3-Hour	143.3	110	331	87031012
	169.1	110	331	88040815
	151.2	100	316	89051118
	156.5	100	316	90011215
	167.7	110	331	91030415
PM₁₀				
Annual	1.7	180	227	87123124
	1.6	120	359	88123124
	1.4	120	359	89123124
	1.6	240	482	90123124
	1.5	240	482	91123124
HSH 24-Hour	24.4	170	229	87100324
	22.0	120	359	88050624
	18.7	120	359	89052524
	21.0	90	311	90061924
	21.3	120	359	91021124

^a Based on 5-year meteorological record, Fort Myers/Ruskin, 1987-91

^b Relative to Southeast corner of Feed Mill building

Note: YYMMDDHH = Year, Month, Day, Hour Ending

H2H = Highest, 2nd-Highest Concentration in 5 years.

Golder Associates Inc.

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November 16, 2000

BUREAU OF AIR REGULATION

0037568

Florida Department of Environmental Protection
New Source Review Section
2600 Blair Stone Road
Tallahassee, FL

Attention: Mr. Joe Kahn, P.E.

RE: SOUTHERN GARDENS CITRUS PROCESSING CORP. (SGCPC)
DRAFT PERMIT NO. 0510015-007-AC; PSD-FL-299
ADDITION OF THREE JUICE EXTRACTORS

Dear Mr. Kahn:

SGCPC has received the draft permit dated October 11, 2000, for the above referenced project from the Florida Department of Environmental Protection. The draft permit has been reviewed, and several comments and concerns have been identified. The comments are addressed below, in the same order as they appear in the draft permit. The comments also reflect my conversation with you of November 15 in regards to the draft permit.

SECTION II

Page 4 of 12

First paragraph, last sentence – in order to clarify that this permit only revises conditions imposed by this permit, revise per the similar statement in Section III, Subsection C (page 12 of 12):

“Except for the conditions of this subsection, no other conditions of previous permitting actions shall be changed by this permit.”

Page 5 of 12

10(c). It is requested that the reasonable precautions specified be consistent with those in SGCPC's final Title V permit.

Page 6 of 12

14. Delete the word “neither” in the first sentence.

Page 9 of 12

28. At the present time, SGCPC elects to use the material balance method of oil recovery using the measured oil in the incoming fruit, divided into the sum of the oil remaining in the juice, the cold press oil recovered, d-limonene recovered, and oil remaining in the dried pellets, expressed as a percentage.

In the third sentence of the second paragraph, reword into two sentences, the first ending with "...facility operation during each month", and the second beginning with "The monthly averages..."

It is understood that the second sentence of the third paragraph, relating to wet peel not processed through the dryer, is consistent with the citrus industry legislation, which assigns oil recovery to the facility where the wet peel is processed through the dryer.

The third paragraph requires that the methodologies for determining oil contents be submitted for approval prior to beginning recordkeeping. Therefore, SGCPD is submitting the proposed methodologies with this comment letter, as follows.

SGCPD proposes to measure oil contents of incoming fruit and dried pellets on a twice per week basis. SGCPD currently measures the available oil in the fruit on a twice per week basis, and this is believed to be adequate for purposes of the material balance. A representative sample of incoming fruit, just prior to the extractors, will be obtained for each sampling event. The results from the two samples will be averaged, and the average used to represent the available oil for that week.

A representative sample of dried pellets discharging from the pellet coolers will also be obtained twice per week. The oil content of the pellets is low, and is believed to not vary greatly from day to day. As a result, the material balance will not be affected greatly by increasing the accuracy with more frequent sampling. The cost of more frequent sampling is not justified.

Both fruit and dried pellet samples will be analyzed using the Braddock method of sample preparation and the Scott Oil method for determining oil content. Copies of these methods are attached.

The amount of dried pellets produced each day will be estimated by measuring the weight of pellets loaded out from the pellet warehouse. This provides a good measure of actual pellet production for the day, since SGCPD has limited storage capacity, and pellets do not remain in storage long.

SECTION III – Subsection A

Page 10 of 12

First paragraph, last sentence – in order to clarify that this permit only revises conditions imposed by this permit, revise per the similar statement in Section III, Subsection C (page 12 of 12):

“Except for the conditions of this subsection, no other conditions of previous permitting actions shall be changed by this permit.”

SECTION III – Subsection B

Page 11 of 12

First paragraph, last sentence – in order to clarify that this permit only revises conditions imposed by this permit, revise per the similar statement in Section III, Subsection C (page 12 of 12):

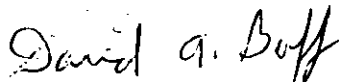
“Except for the conditions of this subsection, no other conditions of previous permitting actions shall be changed by this permit.”

2, 4. SGPCPC proposes to demonstrate compliance with the 47 TPH (daily average) limitation for the peel dryer by measuring the daily pellet production as described above for oil recovery (i.e., by measuring the weight of pellets loaded out from the pellet warehouse). Daily sampling and analysis for moisture content of the wet peel entering the dryer and the dried pellets discharging from the pellet coolers will also be performed. This will allow the wet peel input rate to be calculated by mass balance.

Thank you for consideration of these comments in issuing the final permit. Please call or e-mail me if you have any additional questions concerning this information.

Sincerely,

GOLDER ASSOCIATES INC.



David A. Buff, P.E., Q.E.P.
Principal Engineer
Florida P.E. #19011

DB/jkw

cc: Derek Pridgen

Lisa Gefen

J. Kahn

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C. Holladay

O. Knasulo, SD

EPA

NPS

Appendix D

*Scott Oil Analysis for Citrus Peel
Samples*

DISTRIBUTED BY MARCH 10, 1997
FLORIDA CITRUS PROCESSORS ASSOCIATION
TO: BOARD OF DIRECTORS, FCPA
ENVIRONMENTAL AFFAIRS COMMITTEE, FCPA

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FCPA Winter Haven

MAR 10 1997

ANSWERED



IMPORTANT

Institute of Food and Agricultural Sciences
Citrus Research and Education Center
Mr. Clifford C. Beasley, Jr.
Florida Citrus Processors Association
P.O. Box 780
Winter Haven, FL 33882-0780

Date
700 Experiment Station Road
Lake Alfred FL 33850-2299
Tel (941) 956-1151
Fax (941) 956-4631

March 6, 1997

Re: Scott oil methods for VOC feed mill samples

Dear Cliff:

As VOC tests are now being conducted, I have had a number of calls with questions about applying the Scott oil procedure you distributed for oil in the wet peel residue and press cake. The most common problem is that attempts are made to use the same ratio for pellets as used for wet peel residue. Some very nice paste has been made with 500 g pellets brought to 3000 g by adding water. Simply described, one must bring all samples to the same amount of water based on the moisture content of the sample used.

The following illustrates how 100g dry matter (0% moisture) should be treated:

- 1.) wet peel residue (80% moisture, 20% solids)
100g + 0.2 = 500 g sample. Bring to 3000 g
- 2.) press cake (60% moisture, 40% solids)
100g + 0.4 = 250 g sample. Bring to 3000 g
- 3.) pellets (10% moisture, 90 % solids)
100g + 0.9 = 111 g sample. Bring to 3000 g

If the blender won't hold 3000 g, smaller masses can be used. Although, one shouldn't compromise the statistical uniformity of the sampling procedure. e.g. divide samples by 5.

- 1.) 100 g wet peel -----> 600 g
- 2.) 50 g press cake -----> 600 g
- 3.) 22 g pellets -----> 600 g

The only critical thing about the amount of water is that enough must be used to have a fluid sample for the Scott oil procedure. More is o.k., but less can cause a problem.

If people still have questions, they can call me or my chemist, Rocky Bryan, if I'm not in.

Sincerely,

Bob Braddock



Institute of Food and Agricultural Sciences
Citrus Research and Education Center

700 Experiment Station Road
Lake Alfred FL 33850-2299
Tel. (941) 956-1151
Fax (941) 956-4631

MEMO

To: Cliff Beasley, FCPA

From: R J Braddock, IFAS, CREC Lake Alfred

Date: October 29, 1996

Subject: Method for determining oil in feed mill peel and press cake

Peel source-- grab samples of FMC extractor residue in the feed mill are ok as is if Brown reamer residue, need to slice or break down to quarters so that uniform blending can take place.

Procedure-- 500 gm peel residue or press cake --> q.s. (bring) to 3000 gm with water --> --> blend in large (1 gal size) Waring blender 2 min at medium speed + 1 min at high speed --> --> take 25 gm samples for Scott oil analysis (usually duplicate) --> 25 gm sample in 300 mL round distillation flask, 4 boiling chips + 25 mL isopropanol. --> distill as per Scott oil analysis for juice. Can use 0.025 or 0.10 N bromide-bromate to titrate the distillate. A sample calculation to express oil as lb oil/ ton peel is as follows:

$$\begin{aligned}
 & \frac{11.3 \text{ mL titrant (0.025 N)}}{25 \text{ gm sample}} \times \frac{3000 \text{ gm sample}}{500 \text{ gm peel}} \times \frac{0.001 \text{ mL oil}}{\text{mL titrant}} \times \frac{0.84 \text{ gm oil (density)}}{\text{mL oil}} \\
 & \frac{454 \text{ gm peel}}{1 \text{ lb peel}} \times \frac{1 \text{ lb oil}}{454 \text{ gm oil}} \times \frac{2000 \text{ lb peel}}{\text{ton peel}} = 4.8 \text{ lb oil ton peel}
 \end{aligned}$$

Method 12**SCOTT METHOD (BROMATE TITRATION METHOD)
(After W. C. Scott, USDA/Research)**

The Scott method provides a quick and accurate method for the determination of the oil content (actually limonene, the major component of citrus oil) in single strength or reconstituted citrus juice samples. Isopropanol and water are added to the sample of citrus juice and the mixture is distilled. Dilute hydrochloric acid and methyl orange indicator are added to the distillate and this is titrated with 0.0247N potassium bromide-bromate solution to the disappearance of color. One ml of titrant is equivalent to 0.001 ml d-limonene.

Equipment

1. Burets, 25 ml graduated to 0.1 ml, with reservoir for convenience and easily controllable flow to permit both rapid and drop-wise titration.
2. Heating element (750 watt).
3. Glass beads.
4. Pipettes, 25 ml and 10 ml (automatic pipettes prove to be quite convenient), or 25 ml graduated cylinder for measuring sample and reagents.
5. Beaker, 150 ml.
6. Automatic stirring device (optional).
7. Cool liquid supply for still condenser (tap water acceptable).

Reagents

1. 2-propanol, reagent grade.
2. Dilute hydrochloric acid, one volume concentrated acid to two volumes of distilled water.
3. Methyl orange solution, 0.1% in water.
4. Potassium bromide-bromate solution 0.0247N, prepared by diluting 125 ml of 0.099 N $KBr - BrO_3$ to 50 ml with distilled water.

Note: Acid and indicator solutions can be combined by adding 5 ml of indicator solution to 1000 ml of dilute acid.

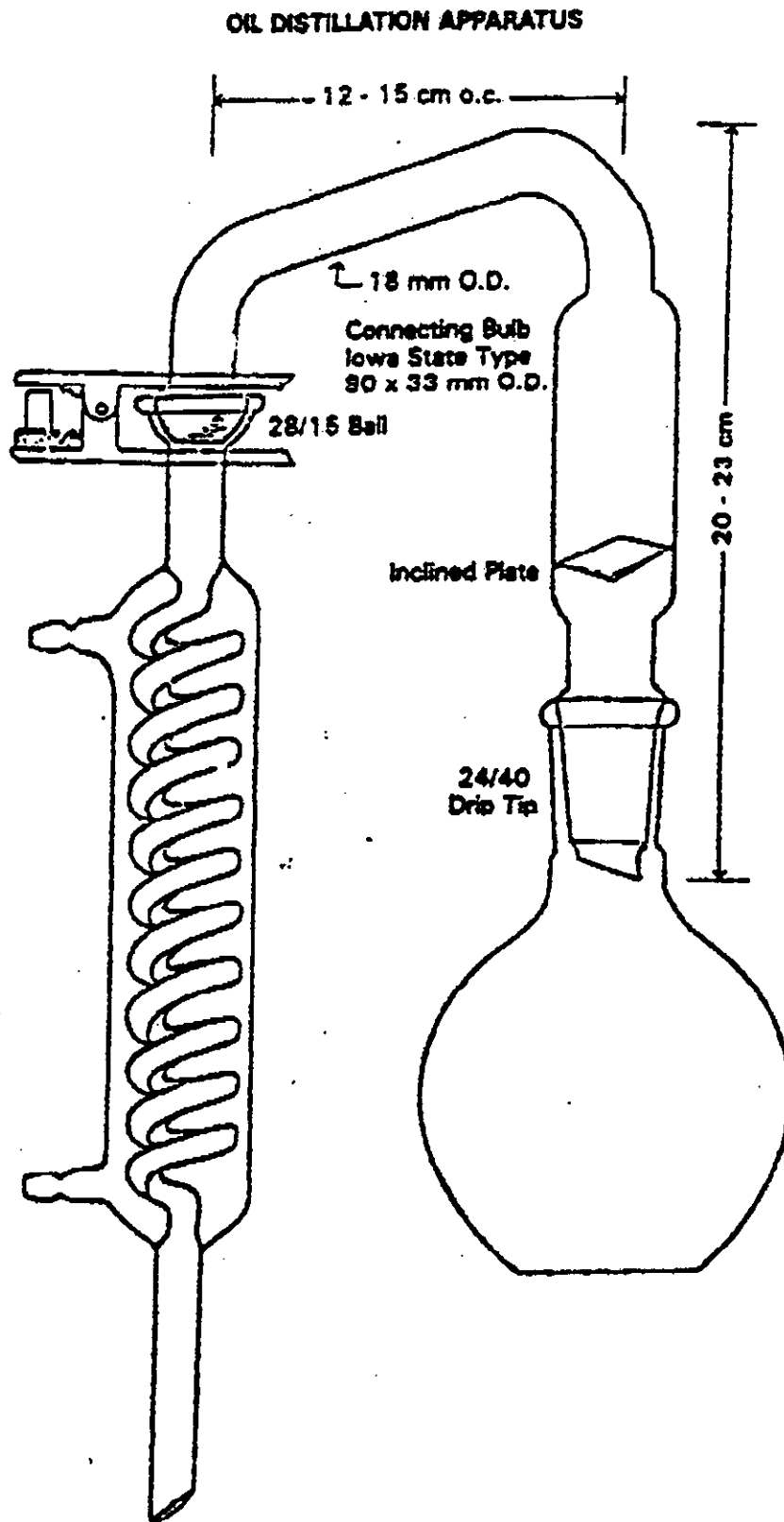
Procedure

1. Titrate 25 ml of 2-propanol and 10 ml of acid solution with .0247N bromide-bromate solution to determine the reagent blank.
2. Pipette 25 ml of juice sample into distillation flask containing glass beads. Add 25 ml 2-propanol and 50 ml water. Distill at full heat to collect approximately 30 ml distillate in 150 ml beaker.
3. Add 10 ml dilute hydrochloric acid and 1 drop methyl orange indicator solution to the distillate (or add 10 ml of combined solution).
4. Titrate solution from step 2 with 0.0247N potassium bromide-bromate solution to colorless end point. Titration is facilitated by using an automatic stirring device. Titrant may be added fairly rapidly until the red color begins to fade, but must be added dropwise near the end to avoid overrunning the endpoint.

Calculation

Subtract the ml of reagent blank from the ml titrated for sample. Multiply the result by 0.004 to obtain percent recoverable oil by volume in the juice sample.

Figure 4





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

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Mr. A. A. Linero, P.E.
Florida Department of Environmental Protection
Division of Air Resources Management
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

SUBJ: Preliminary Determination and Draft PSD Permit for Southern Gardens Citrus Processing Corp. (PSD-FL-299), Clewiston, Polk County, Florida

Dear Mr. Linero:

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conservative approach in that past actual emissions (for comparison with future potential emissions) were lower during this period than during other recent periods.

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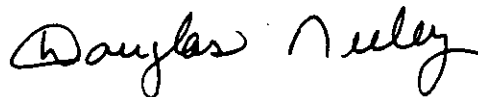
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 - b. The PM₁₀ and CO emission rates for both the short-term and long-term periods do not agree with those provided in the permit application.
 - c. The boilers' long-term hourly emission rates were estimated from the annual emissions (tons per year divided by 8,760 hours). This method is appropriate for the boilers as they are permitted for a full year's operation. The same method appears to have been used to estimate the long-term hourly emission rates for the Peel Dryer and Pellet Coolers. This is not appropriate because these units are only permitted to operate a maximum of 6,000 hours per year.
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4. PSD Increment Assessment - The maximum cumulative PSD increment concentrations are reported to occur at the site boundary. No additional refined modeling was performed. Modeling should be performed to 100 meter resolution around the maximum and/or controlling concentrations. If the next closest receptors are more than 100 meters in distance from the site boundary, more refined modeling is needed.
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 - b. The estimated maximum change in visibility for the regional haze assessment appears to exceed the 0.5 deciview guideline threshold value.

If you have any questions regarding the comments in this letter, please call either Jim Little at (404) 562-9118 or Stan Krivo at (404) 562-9123.

Sincerely,



R. Douglas Neeley
 Chief
 Air and Radiation Technology Branch
 Air, Pesticides and Toxics
 Management Division

cc: G. Kohn
 C. Holladay
 D. Buff, Halden
 D. Knowles, SD
 NPS



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

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NOV 16 2000

NOV 20 2000

4APT-ARB

BUREAU OF AIR REGULATION

Mr. A. A. Linero, P.E.
Florida Department of Environmental Protection
Division of Air Resources Management
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

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NO
NEED

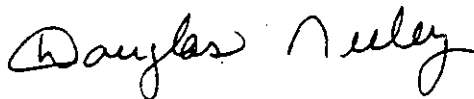
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R. Douglas Neeley
Chief

Air and Radiation Technology Branch
Air, Pesticides and Toxics
Management Division

cc: J. Kahn
C. Nalladani
C. Bueff, Ecol
D. Kromelid, SD
NPS

Golder Associates Fax

To: Joe Khan
Company: FDEP
From: David Buff
Our ref: 003-7568

Fax Number: 850-922-6979
Date: November 17, 2000
e-mail: @golder.com
Voice Mail:

RE:

Total pages (including cover): 4

Hard copy to follow

MESSAGE



6241 NW 23rd St, Suite 600
Gainesville, FL 32653
U.S.A.
Telephone: (352) 336-5600
Fax: (352) 336-6603

**Comprehensive Consulting
Services in Geotechnical
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Remediation and Waste
Management**

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Golder Associates Inc.

6241 NW 23rd Street, Suite 600
Gainesville, FL 32653-1500
Telephone (352) 336-5600
Fax (352) 336-6603



November 16, 2000

0037568

Florida Department of Environmental Protection
New Source Review Section
2600 Blair Stone Road
Tallahassee, FL

Attention: Mr. Joe Kahn, P.E.

RE: SOUTHERN GARDENS CITRUS PROCESSING CORP. (SGCPC)
DRAFT PERMIT NO. 0510015-007-AC; PSD-FL-299
ADDITION OF THREE JUICE EXTRACTORS

Dear Mr. Kahn:

SGCPC has received the draft permit dated October 11, 2000, for the above referenced project from the Florida Department of Environmental Protection. The draft permit has been reviewed, and several comments and concerns have been identified. The comments are addressed below, in the same order as they appear in the draft permit. The comments also reflect my conversation with you of November 15 in regards to the draft permit.

SECTION II**Page 4 of 12**

First paragraph, last sentence – in order to clarify that this permit only revises conditions imposed by this permit, revise per the similar statement in Section III, Subsection C (page 12 of 12):

“Except for the conditions of this subsection, no other conditions of previous permitting actions shall be changed by this permit.”

Page 5 of 12

10(c). It is requested that the reasonable precautions specified be consistent with those in SGCPC's final Title V permit.

Page 6 of 12

14. Delete the word “neither” in the first sentence.

Page 9 of 12

28. At the present time, SGCPC elects to use the material balance method of oil recovery using the measured oil in the incoming fruit, divided into the sum of the oil remaining in the juice, the cold press oil recovered, d-limonene recovered, and oil remaining in the dried pellets, expressed as a percentage.

FDEP
Mr. Joe Kahn, P.E.

- 2 -

November 16, 2000
0037568

In the third sentence of the second paragraph, reword into two sentences, the first ending with "...facility operation during each month", and the second beginning with "The monthly averages..."

It is understood that the second sentence of the third paragraph, relating to wet peel not processed through the dryer, is consistent with the citrus industry legislation, which assigns oil recovery to the facility where the wet peel is processed through the dryer.

The third paragraph requires that the methodologies for determining oil contents be submitted for approval prior to beginning recordkeeping. Therefore, SGPCPC is submitting the proposed methodologies with this comment letter, as follows.

SGPCPC proposes to measure oil contents of incoming fruit and dried pellets on a twice per week basis. SGPCPC currently measures the available oil in the fruit on a twice per week basis, and this is believed to be adequate for purposes of the material balance. A representative sample of incoming fruit, just prior to the extractors, will be obtained for each sampling event. The results from the two samples will be averaged, and the average used to represent the available oil for that week.

A representative sample of dried pellets discharging from the pellet coolers will also be obtained twice per week. The oil content of the pellets is low, and is believed to not vary greatly from day to day. As a result, the material balance will not be affected greatly by increasing the accuracy with more frequent sampling. The cost of more frequent sampling is not justified.

Both fruit and dried pellet samples will be analyzed using the Braddock method of sample preparation and the Scott Oil method for determining oil content. Copies of these methods are attached.

The amount of dried pellets produced each day will be estimated by measuring the weight of pellets loaded out from the pellet warehouse. This provides a good measure of actual pellet production for the day, since SGPCPC has limited storage capacity, and pellets do not remain in storage long.

SECTION III - Subsection A

Page 10 of 12

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FDEP
Mr. Joe Kahn, P.E.

November 16, 2000
0037568

- 3 -

SECTION III - Subsection B

Page 11 of 12

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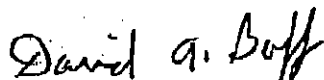
"Except for the conditions of this subsection, no other conditions of previous permitting actions shall be changed by this permit."

2, 4. SGCPC proposes to demonstrate compliance with the 47 TPH (daily average) limitation for the peel dryer by measuring the daily pellet production as described above for oil recovery (i.e., by measuring the weight of pellets loaded out from the pellet warehouse). Daily sampling and analysis for moisture content of the wet peel entering the dryer and the dried pellets discharging from the pellet coolers will also be performed. This will allow the wet peel input rate to be calculated by mass balance.

Thank you for consideration of these comments in issuing the final permit. Please call or e-mail me if you have any additional questions concerning this information.

Sincerely,

GOLDER ASSOCIATES INC.



David A. Buff, P.E., Q.E.P.
Principal Engineer
Florida P.E. #19011

DB/jkw

cc: Derek Pridgen
Lisa Gefen

\\CATORBALT\DP\Projects\2000\0037\0037568 Southern Gardens\011\011r.doc

NOV-17-2000 02:26 FROM SOUTHERN GARDENS CITRUS

TO

13523366603

P.02

Appendix D

*Scott Oil Analysis for Citrus Peel
Samples*

NEU-17-2000 02:27 FROM SOUTHERN GARDENS CITRUS TO

13523366603 P. 03

DISTRIBUTED BY MARCH 10, 1997
 FLORIDA CITRUS PROCESSORS ASSOCIATION
 TO: BOARD OF DIRECTORS FCPA
 ENVIRONMENTAL AFFAIRS COMMITTEE, FCPA

RECEIVED
 F.C.P.A. Winter Haven

MAR 10 1997

ANSWERED

**IMPORTANT**

Institute of Food and Agricultural Sciences
 Citrus Research and Education Center
 Mr. Clifford C. Beasley, Jr.
 Florida Citrus Processors Association
 P.O. Box 780
 Winter Haven, FL 33882-0780

Date
 700 Experiment Station Road
 Lake Alfred FL 33850-2299
 Tel (941) 954-3151
 Fax (941) 956-4631

March 6, 1997

Re: Scott oil methods for VOC feed mill samples

Dear Cliff:

As VOC tests are now being conducted, I have had a number of calls with questions about applying the Scott oil procedure you distributed for oil in the wet peel residue and press cake. The most common problem is that attempts are made to use the same ratio for pellets as used for wet peel residue. Some very nice paste has been made with 500 g pellets brought to 3000 g by adding water. Simply described, one must bring all samples to the same amount of water based on the moisture content of the sample used.

The following illustrates how 100g dry matter (0% moisture) should be treated:

- 1.) wet peel residue (80% moisture, 20% solids)
 $100g \div 0.2 = 500$ g sample. Bring to 3000 g
- 2.) press cake (60% moisture, 40% solids)
 $100g \div 0.4 = 250$ g sample. Bring to 3000 g
- 3.) pellets (10% moisture, 90 % solids)
 $100g \div 0.9 = 111$ g sample. Bring to 3000 g

If the blender won't hold 3000 g, smaller masses can be used. Although, one shouldn't compromise the statistical uniformity of the sampling procedure, e.g. divide samples by 5.

- | | | |
|---------------------|--------|-------|
| 1.) 100 g wet peel | -----> | 600 g |
| 2.) 50 g press cake | -----> | 600 g |
| 3.) 22 g pellets | -----> | 600 g |

The only critical thing about the amount of water is that enough must be used to have a fluid sample for the Scott oil procedure. More is o.k., but less can cause a problem.

If people still have questions, they can call me or my chemist, Rocky Bryan, if I'm not in.

Sincerely,

NOV-17-2000 02:27 FROM SOUTHERN GARDENS CITRUS TO

13523366603 P.04



Institute of Food and Agricultural Sciences
Citrus Research and Education Center

700 Experiment Station Road
Lake Alfred FL 33850-2299
Tel. (941) 956-1153
Fax (941) 956-6611

MEMO

To: Cliff Bensley, FCPA

From: R J Braddock, IFAS, CREC Lake Alfred

Date: October 29, 1996

Subject: Method for determining oil in food mill peel and press cake

Peel source-- grab samples of FMC extractor residue in the food mill are ok as is. If Brown runner residue, need to slice or break down to quarters so that uniform bleeding can take place.

Procedure-- 500 gm peel residue or press cake --> q.s. (bring) to 3000 gm with water-->

-->bleed in large (1 gal size) Waring blender 2 min at medium speed + 1 min at high speed -->

-->take 25 gm samples for Scott oil analysis (usually duplicate) --> 25 gm sample in 300 mL

round distillation flask, 4 boiling chips + 25 mL isopropanol. --> distill as per Scott oil analysis

for juice. Can use 0.025 or 0.10 N bromide-bromate to titrate the distillate. A sample calculation

to express oil as lb oil/ton peel is as follows:

$$\begin{aligned}
 & \frac{11.3 \text{ mL titrant (0.025 N)}}{25 \text{ gm sample}} \times \frac{3000 \text{ gm sample}}{500 \text{ gm peel}} \times \frac{0.001 \text{ mL titrant}}{\text{mL titrant}} \times \frac{0.84 \text{ gm oil (density)}}{\text{mL oil}} \\
 & \frac{654 \text{ gm oil}}{1 \text{ lb peel}} \times \frac{1 \text{ lb oil}}{454 \text{ gm oil}} \times \frac{2000 \text{ lb peel}}{\text{ton peel}} = \frac{2.87 \text{ lb oil}}{\text{ton peel}}
 \end{aligned}$$

Method 12

SCOTT METHOD (BROMATE TITRATION METHOD)
(After W. C. Scott, USDA/Research)

The Scott method provides a quick and accurate method for the determination of the oil content (actually limonene, the major component of citrus oil) in single strength or reconstituted citrus juice samples. Isopropanol and water are added to the sample of citrus juice and the mixture is distilled. Dilute hydrochloric acid and methyl orange indicator are added to the distillate and this is titrated with 0.0247N potassium bromide-bromate solution to the disappearance of color. One ml of titrant is equivalent to 0.001 ml d-limonene.

Equipment

1. Burette, 25 ml graduated to 0.1 ml, with reservoir for convenience and easily controllable flow to permit both rapid and drop-wise titration.
2. Heating element (750 watt).
3. Glass beads.
4. Pipettes, 25 ml and 10 ml (automatic pipettes prove to be quite convenient), or 25 ml graduated cylinder for measuring sample and reagents.
5. Beaker, 150 ml.
6. Automatic stirring device (optional).
7. Cool liquid supply for still condenser (tap water acceptable).

Reagents

1. 2-propanol, reagent grade.
2. Dilute hydrochloric acid, one volume concentrated acid to two volumes of distilled water.
3. Methyl orange solution, 0.1% in water.
4. Potassium bromide-bromate solution 0.0247N, prepared by diluting 125 ml of 0.099 N $KBr - BrO_3$ to 50 ml with distilled water.

Note: Acid and indicator solutions can be combined by adding 5 ml of indicator solution to 1000 ml of dilute acid.

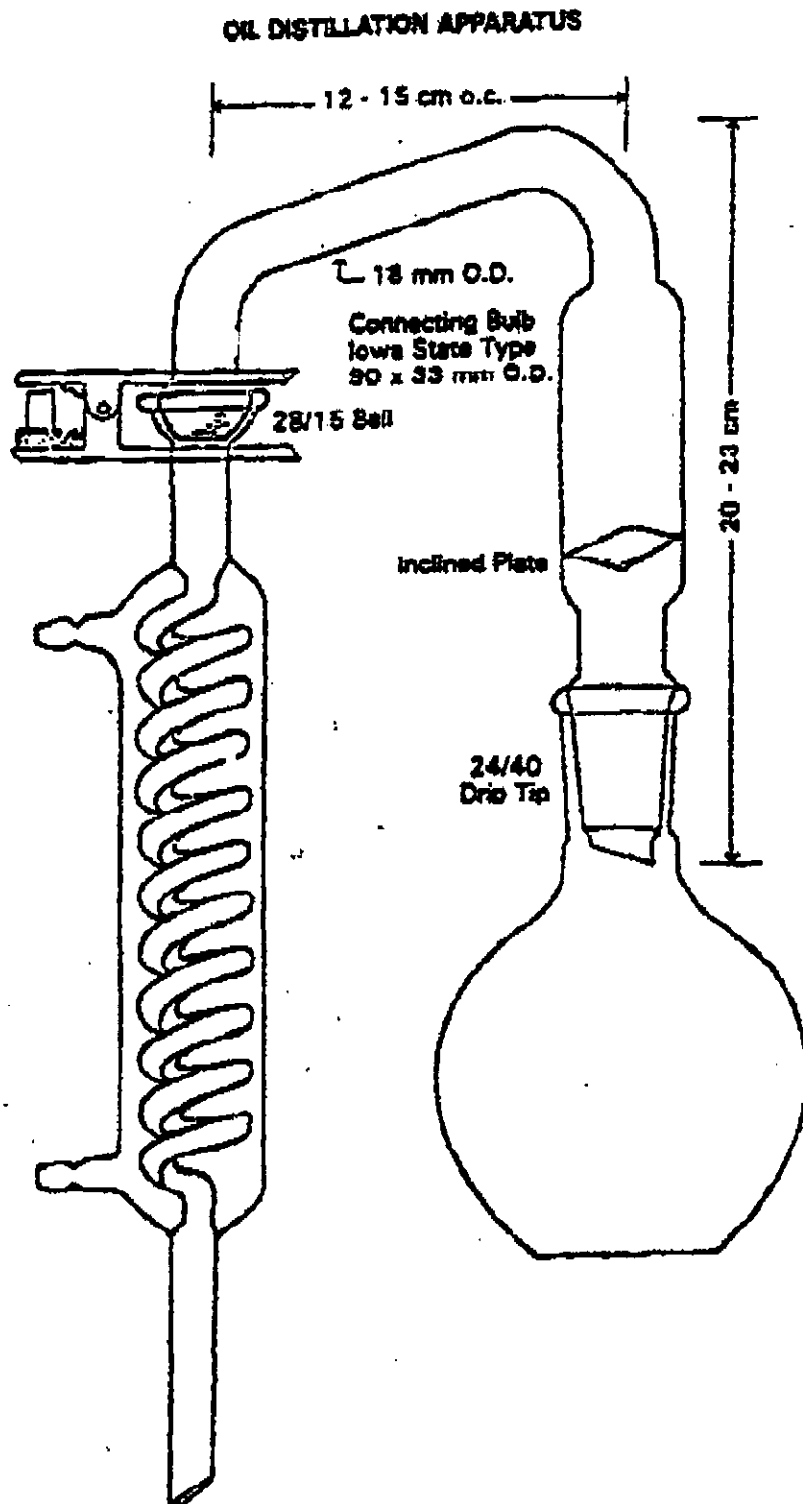
Procedure

1. Titrate 25 ml of 2-propanol and 10 ml of acid solution with 0.0247N bromide-bromate solution to determine the reagent blank.
2. Pipette 25 ml of juice sample into distillation flask containing glass beads. Add 25 ml 2-propanol and 50 ml water. Distill at full heat to collect approximately 30 ml distillate in 150 ml beaker.
3. Add 10 ml dilute hydrochloric acid and 1 drop methyl orange indicator solution to the distillate (or add 10 ml of combined solution).
4. Titrate solution from step 2 with 0.0247N potassium bromide-bromate solution to colorless end point. Titration is facilitated by using an automatic stirring device. Titrant may be added fairly rapidly until the red color begins to fade, but must be added dropwise near the end to avoid overrunning the endpoint.

Calculation

Subtract the ml of reagent blank from the ml titrated for sample. Multiply the result by 0.004 to obtain percent recoverable oil by volume in the juice sample.

Figure 4.





UNI

Post-It™ brand fax transmittal memo 7671		# of pages ▶ 3
To Cleve Holladay	From Stan Krive	
Co.	Co.	
Dept.	Phone #	
Fax # 850/922-6979	Fax #	

NOV 16 2000

4APT-ARB

Mr. A. A. Linero, P.E.
 Florida Department of Environmental Protection
 Division of Air Resources Management
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In terms of the air quality impact assessment, our review comments on this PSD application were discussed with FDEP on November 14, 2000. The additional information provided in this discussion resolved some of our comments and questions. The following are our unresolved comments:

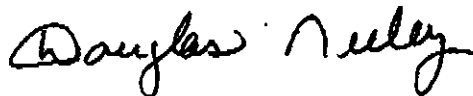
1. Potential Boiler Emissions - Table 2-6 provides estimates of potential emissions from Boilers 1-4 operation. These emissions are based on emission factors and the assumption of 8,760 hours of operation per year. The values in the column "Total Boiler Nos. 1, 2, 3, and 4" do not equal to the sum of Boilers #1-3 (Note: Boiler #4 only operates in standby mode). Because these same values appear in Tables 2-2 and 6-2 and are used in the impact assessment, the basis for the total emissions in this column should be provided.
2. Southern Gardens Citrus Processing (SGCP) Facility Emissions - Table 6-2 provides both the short-term and long-term emission rates for SGCP. The following items were noted.
 - a. The current and future short-term hourly emission rates are equal. The future short-term hourly emission rates for the Peel Dryer/WHE and Pellet Coolers will increase.
 - b. The PM_{10} and CO emission rates for both the short-term and long-term periods do not agree with those provided in the permit application.
 - c. The boilers' long-term hourly emission rates were estimated from the annual emissions (tons per year divided by 8,760 hours). This method is appropriate for the boilers as they are permitted for a full year's operation. The same method appears to have been used to estimate the long-term hourly emission rates for the Peel Dryer and Pellet Coolers. This is not appropriate because these units are only permitted to operate a maximum of 6,000 hours per year.
 - d. Confirmation is needed that natural gas is not a source of fuel for this facility and the plant operates throughout the year (i.e., not operating on a seasonal basis).

3

3. **Site Boundary** - The site boundary used in the modeling is provided in Table 6-10. The permit application does not contain a figure showing the plant site boundary. Confirmation is needed that the modeled site boundary has a physical barrier to public access and encompasses land owned or controlled by SGCP Corporation.
4. **PSD Increment Assessment** - The maximum cumulative PSD increment concentrations are reported to occur at the site boundary. No additional refined modeling was performed. Modeling should be performed to 100 meter resolution around the maximum and/or controlling concentrations. If the next closest receptors are more than 100 meters in distance from the site boundary, more refined modeling is needed.
5. **Operational Limit (Peel Dryer and Pellet Cooler)** - The impact modeling only included the Peel Dryer and Pellet Cooler emissions from the months of January through May and November and December. This seven month period is less than the permitted 6,000 hours of annual operation. The limited operation of these units should be included as a permit condition.
6. **Class I Assessment** - The federal land manager for the Everglades National Park should be provided an opportunity to review and comment on this preliminary determination and draft PSD permit. Two items in the Class I area impact assessment need further explanation:
 - a. The Class I modeled hourly emission rates are different from those provided in Table 6-2 and used in the Class II assessment
 - b. The estimated maximum change in visibility for the regional haze assessment appears to exceed the 0.5 deciview guideline threshold value.

If you have any questions regarding the comments in this letter, please call either Jim Little at (404) 562-9118 or Stan Krivo at (404) 562-9123.

Sincerely,



R. Douglas Neeley
Chief
Air and Radiation Technology Branch
Air, Pesticides and Toxics
Management Division

SOUTHERN GARDENS CITRUS

October 24, 2000

RECEIVED

OCT 25 2000

Joseph Kahn, P.E.
Department of Environmental Protection
Bureau of Air Regulation
Suite 4, 111 S. Magnolia Drive
Tallahassee, FL 32301

BUREAU OF AIR REGULATION

Re: Southern Gardens Citrus Processing Corporation
DEP File No. 0510015-007-AC, PSD-FL299
Affidavit of Publication

Dear Mr. Kahn:

Please find enclosed the original Affidavit of Publication provided by Clewiston News. The Public Notice of Intent to Issue Air Construction Permit was published on October 18, 2000, in the legal advertisement section of the Clewiston News.

Your attention to this matter is greatly appreciated and if additional information is required, I can be contacted at (863)-902-4178.

Sincerely,

SOUTHERN GARDENS CITRUS PROCESSING CORPORATION



Derek Pridgen

cc: J. Kahn
C. Holladay
D. Buff, Golden
R. Blackburn, SD
EPA
WPS

The Clewiston News

Published Weekly

Clewiston, Florida

AFFIDAVIT OF PUBLICATION

State of Florida

County of Hendry

Before the undersigned authority, personally appeared Katrina Elsen, who on oath says she is the Executive Editor of the Clewiston News, a weekly newspaper published at Clewiston in Hendry County, Florida, that the attached copy of advertisement, being a Notice in

the matter of Intent to Issue
Air Construction Permit
RECEIVED in the

OCT 25 2000

court, was published in

said newspaper in the issue of October 18, 2000
BUREAU OF AIR REGULATION

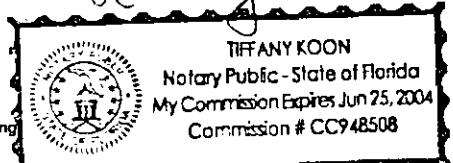
Affiant further says that the said Clewiston News is a newspaper published at Clewiston, in said Hendry County, continuously published in said Hendry County, Florida, each week, and has been entered as a second class mail matter at the post office in Clewiston, in said Hendry County, Florida, for a period of one year next preceding the first publication says that he has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.

Katrina Elsen

Sworn to and subscribed before me this 18th day of October, A.D. 2000.

Tiffany Koon

Notary Public



Lyons Printing

PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL PROTECTION

DEP File No. 0510015-007-AC, PSD-FL-299

Southern Gardens Citrus Processing Corp.

Addition of 3 Juice Extractors

Hendry County

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit to Southern Gardens Citrus Processing Corp., to install three additional juice extractors at the existing facility located at 755 County Road 833, Clewiston, Hendry County. The applicant's mailing address is: PO Box 130, Clewiston, Florida 33440. A Best Available Control Technology (BACT) determination was required for this project pursuant to Rule 62-212.400, F.A.C., for three existing d-limonene storage tanks. The permit removes specific emission limits for volatile liquid storage tanks, but limits potential emission of air pollutants by limiting fruit throughput and operation of certain exiting emissions units at the facility.

An air quality impact was conducted. Emissions from the facility will not significantly contribute to or cause a violation of any state or federal ambient air quality standards. The maximum predicted PSD Class II increments of SO₂ and PM₁₀ consumed by all sources in the area, including this project, will be as follows:

	PSD Class II Increment Consumed (ug/m ³)	Allowable Increment (ug/m ³)	Percent Increment Consumed
PM ₁₀			
24-hour	22	31	73
Annual	1	17	6
SO ₂			
3-hour	168	512	33
24-hour	77	91	85
Annual	3	20	15

The Department will issue the final permit with the attached conditions unless a response received in accordance with the following procedures results in a different decision or a significant change of terms or conditions.

The Department will accept written comments and requests for public meetings concerning the proposed permit issuance action for a period of thirty (30) days from the date of publication of this Public Notice of Intent to Issue Air Construction Permit. Written comments and requests for public meetings should be provided to the Department Bureau of Air Regulation at 2600 Blair Stone Road, Mall Station #5505, Tallahassee, FL 32399-2400.

Any written comments filed shall be made available for public inspection. If written comments received result in a significant change to the proposed agency action, the Department shall revise the proposed permit and require, if applicable another Public Notice.

The Department will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to section 120-569 and 120-57 F.S., before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below.

Mediation is not available in this proceeding.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office Of General Counsel of the Department at 3900 Commonwealth Boulevard, Mall Station #35, Tallahassee, FL, 32399-3000. Petitions filed by the permit applicant or any of the parties listed below

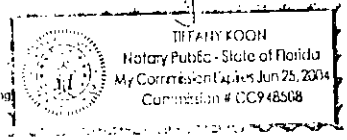
...ing this advertisement for publication in the said newspaper.

Katrina Elshen

born to and subscribed before me this 18th day

of October, A.D. 192000

Tiffany Koon
Notary Public



The Department will accept written comments and requests for public the proposed permit issuance action for a period of thirty (30) days from the date of the Public Notice of Intent to Issue Air Construction Permit. Written comments and meetings should be provided to the Department Bureau of Air Regulation at 201 Mall Station #5505, Tallahassee, FL 32399-2400.

Any written comments filed shall be made available for public inspection. If a comment received result in a significant change to the proposed agency action, the Department may be required to issue another Public Notice.

The Department will issue the permit with the attached conditions unless an administrative hearing is filed pursuant to section 120.569 and 120.57 F.S. for filing a petition. The procedures for petitioning for a hearing are set forth in Rule 28-106.301. Mediation is not available in this proceeding.

A person whose substantial interests are affected by the proposed permit petition for an administrative proceeding (hearing) under sections 120.569 and 120.57 F.S. Statutes. The petition must contain the information set forth below and must be filed with the Office Of General Counsel of the Department at 3900 Commonwealth Boulevard, Tallahassee, FL, 32399-3000. Petitions filed by the permit applicant or any other person must be filed within fourteen days of receipt of this notice of intent. Petitions filed by other than those entitled to written notice under section 120.60(3) of the Florida Statutes must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of intent, whichever occurs first. Under section 120.60(3), however, any person who files a petition with the Department for notice of agency action may file a petition within fourteen days of the date of notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the permit applicant at the address indicated above at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to an administrative determination (hearing) under sections 120.569 and 120.57 F.S., or to attend the proceeding and participate as a party to it. Any subsequent intervention will be on the terms of the presiding officer upon the filing of a motion in compliance with Rule 28-106.301 of the Florida Administrative Code.

A petition that disputes the material facts on which the Department's decision is based shall contain the following information: (a) The name and address of each agency and the agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner, the name, address, and telephone number of the petitioner's representative; (c) The address for service proposed during the course of the proceeding; (d) A statement of how the petitioner's substantial interests will be affected by the agency determination; (e) A statement of how and when the petitioner received notice of the agency action or proposed action; (f) A statement of the ultimate facts alleged, including the specific facts the petitioner contends require reversal or modification of the agency's proposed action; (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner requests the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the Department's decision is based shall state the no such facts are in dispute and otherwise shall contain the information set forth above, as required by rule 28-106.301.

Because the administrative hearing process is designed to formulate final action, the filing of a petition means that the Department's final action may be different from the action proposed by it in this notice. Persons whose substantial interests will be affected by any action of the Department on the application have the right to petition to become a party to the proceeding in accordance with the requirements set forth above.

A complete project file is available for public inspection during normal business hours from 8:00 am to 5:00 pm, Monday through Friday, except legal holidays, at:

Department of Environmental Protection Bureau of Air Regulation Suite 4, 111 S. Magnolia Drive Tallahassee, Florida 32301 Telephone: 850/488-0114 Fax: 850/922-6979	Department of Environmental Protection South Florida District Suite 364, 2295 Victoria A Fort Myers, Florida 33901 Telephone: 941/332-6975
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The complete project file includes the application, technical evaluation, and the information submitted by the responsible official, exclusive of confidential information. Interested persons may contact the Administrator, New Source Review, Department of Environmental Protection, Bureau of Air Regulation, Mail Station #5505, Tallahassee, Florida, or call 850/488-0114, for additional information. Written comments should be sent to the following mailing address: Department of Environmental Protection, Bureau of Air Regulation, Mail Station #5505, Tallahassee, Florida 32399-2400.