

Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

August 23, 2002

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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

Re: Extension of Expiration Date of Permit No. 0510015-008-AC
Backup Peel Dryer No. 2

Dear Mr. Chapman:

The applicant applied on July 31, 2002 to the Department for an extension of the expiration date of air construction permit number 0510015-008-AC for the installation of a backup peel dryer at their existing citrus processing Plant located at 755 CR 883, Clewiston, Hendry County. The Department has reviewed the request. The expiration date is hereby extended from July 31, 2002 to December 31, 2002 to allow additional time for compliance testing and submittal of a Title V operating permit revision application.

A copy of this letter shall be filed with the referenced permit and shall become part of the permit. This permitting decision is issued pursuant to Chapter 403, Florida Statutes.

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, Mail Station #35, Tallahassee, Florida, 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of intent. Petitions filed by any persons 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 this notice of intent, whichever occurs first. Under section 120.60(3), however, any person who asked the Department for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the 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 request an administrative determination (hearing) under sections 120.569 and 120.57 F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205 of the Florida Administrative Code.

A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each 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, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's

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substantial interests will be affected by the agency determination; (c) A statement of how and when petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes 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 action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision 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. Mediation is not available in this proceeding.

In addition to the above, a person subject to regulation has a right to apply for a variance from or waiver of the requirements of particular rules, on certain conditions, under Section 120.542 F.S. The relief provided by this state statute applies only to state rules, not statutes, and not to any federal regulatory requirements. Applying for a variance or waiver does not substitute or extend the time for filing a petition for an administrative hearing or exercising any other right that a person may have in relation to the action proposed in this notice of intent.

The application for a variance or waiver is made by filing a petition with the Office of General Counsel of the Department, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. The petition must specify the following information: (a) The name, address, and telephone number of the petitioner; (b) The name, address, and telephone number of the attorney or qualified representative of the petitioner, if any; (c) Each rule or portion of a rule from which a variance or waiver is requested; (d) The citation to the statute underlying (implemented by) the rule identified in (c) above; (e) The type of action requested; (f) The specific facts that would justify a variance or waiver for the petitioner; (g) The reason why the variance or waiver would serve the purposes of the underlying statute (implemented by the rule); and (h) A statement whether the variance or waiver is permanent or temporary and, if temporary, a statement of the dates showing the duration of the variance or waiver requested.

The Department will grant a variance or waiver when the petition demonstrates both that the application of the rule would create a substantial hardship or violate principles of fairness, as each of those terms is defined in Section 120.542(2) F.S., and that the purpose of the underlying statute will be or has been achieved by other means by the petitioner.

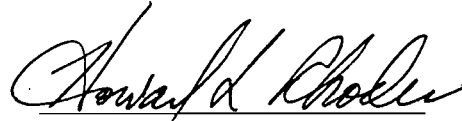
Persons subject to regulation pursuant to any federally delegated or approved air program should be aware that Florida is specifically not authorized to issue variances or waivers from any requirements of any such federally delegated or approved program. The requirements of the program remain fully enforceable by the Administrator of the EPA and by any person under the Clean Air Act unless and until the Administrator separately approves any variance or waiver in accordance with the procedures of the federal program.

This permitting decision is final and effective on the date filed with the clerk of the Department unless a petition is filed in accordance with the above paragraphs or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition pursuant to Rule 62-

110.106, F.A.C., and the petition conforms to the content requirements of Rules 28-106.201 and 28-106.301, F.A.C. Upon timely filing of a petition or a request for extension of time, this order will not be effective until further order of the Department.

Any party to this permitting decision (order) has the right to seek judicial review of it under section 120.68 of the Florida Statutes, by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel, Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000, and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within thirty days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida.



Howard L. Rhodes, Director
Division of Air Resources
Management

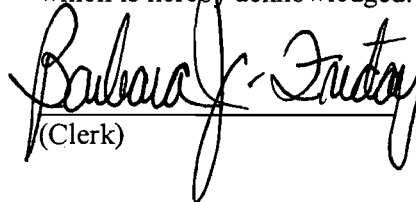
CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this order was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 8/23/02 to the person(s) listed:

Mr. Tristan Chapman, Southern Gardens Citrus Processing Corporation *
Mr. David Buff, P.E., Golder Associates
Mr. Ron Blackburn, P.E., DEP SD

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED,
on this date, pursuant to §120.52, Florida Statutes,
with the designated Department Clerk, receipt of
which is hereby acknowledged.

 8/23/02
(Clerk) (Date)

Golder Associates Inc.

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

July 31, 2002

RECEIVED

AUG 05 2002

DIVISION OF AIR
RESOURCES MANAGEMENT

fax received 7/31/02



**Golder
Associates**

ORIGINAL: CLAIR

xc: HLR

8/5

0137582

Florida Department of Environmental Protection
Division of Air Resources Management
2600 Blair Stone Road, MS 5500
Tallahassee, Florida 32399-2400

Attention: Howard L. Rhodes, Director

RE: SOUTHERN GARDENS CITRUS PROCESSING CORPORATION
PERMIT NO. 0510015-008-AC
PEEL DRYER NO. 2

Dear Mr. Rhodes:

On behalf of Southern Gardens Citrus Processing Corporation (Southern Gardens), Golder Associates Inc. is requesting an extension of the Peel Dryer No. 2 construction permit, Permit No. 0510015-008-AC, which expires July 31, 2002.

Physical construction of Peel Dryer No. 2 has been completed, although the unit did not begin operating during the past citrus processing season, which ended in June. Southern Gardens is currently in the process of revising their Title V operating permit, Permit No. 0510015-004-AV, to include Peel Dryer No. 2 and the specific conditions of the construction permit. To allow for processing time of the application for the Title V revision, we are requesting an extension of the Peel Dryer No. 2 construction permit, Permit No. 0510015-008-AC, until December 31, 2002.

If you have any questions about this request, please call me at (352) 336-5600.

Sincerely,

GOLDER ASSOCIATES INC.

David A. Buff

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

DB/nav

cc: D. Pridgen, Southern Gardens
O. Rodriguez, Southern Gardens

RECEIVED

AUG 07 2002

BUREAU OF AIR REGULATION

P:\Projects\2001\0137582 Southern Gardens\4.1\1\073102b.doc

SENDER: COMPLETE THIS SECTION

- 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, General Manager
 Southern Gardens Citrus Processing
 Post Office Box 130
 Clewiston, Florida 33440

2. Article Number (Copy from service label)

7000 0600 0021 6524 3271

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) B. Date of Delivery
 8-26-02

C. Signature Agent
 Addressee

D. Is delivery address different from item 1? Yes
 If 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

**U.S. Postal Service
 CERTIFIED MAIL RECEIPT**
 (Domestic Mail Only; No Insurance Coverage Provided)

7000 0600 0021 6524 3271

Article Sent To:
 Mr. Tristan Chapman, Vice President

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

Postmark
 Here

Name (Please Print Clearly) (to be completed by mailer)
 Mr. Tristan Chapman, Vice President
 Street, Apt. No.; or PO Box No.
 Post Office Box 130
 City, State, ZIP+4
 Clewiston, Florida 33440

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
NOTICE OF FINAL PERMIT

In the Matter of an
Application for Permit by:

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

DEP File No. 0510015-008-AC
Backup Peel Dryer No. 2
Hendry County

Enclosed is Final Permit Number 0510015-008-AC. This permit authorizes Southern Gardens Citrus Processing Corp. to install a backup peel dryer at its existing facility located at 755 County Road 833, Clewiston, Hendry County. This permit is issued pursuant to Chapter 403, Florida Statutes.

Any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes, by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel, Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000, and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within thirty days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida.



C. H. Fancy, P.E., Chief
Bureau of Air Regulation

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Notice of Final Permit (including the Final permit) was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 11/28/01 to the person(s) listed:

Mr. Tristan Chapman, Southern Gardens Citrus Processing Corporation *
Mr. David Buff, P.E., Golder Associates
Mr. Ron Blackburn, P.E., DEP SD

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to §120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

Victoria Gibson 11/28/01
(Clerk) (Date)

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none"> 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. 	A. Received by (Please Print Clearly) <i>ANDREA SOLIS</i>	B. Date of Delivery <i>11-30</i>
	C. Signature <i>X Andrea Solis</i>	
1. Article Addressed to:	<input type="checkbox"/> Agent <input type="checkbox"/> Addressee	
Mr. Tristan Chapman Vice President & General Manager Southern Gardens Citrus Processing Corporation Post Office Box 130 Clewiston, FL 33440	D. Is delivery address different from item 1? If YES, enter delivery address below:	
	<input type="checkbox"/> Yes <input type="checkbox"/> No	
	3. Service Type	
	<input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.	
	4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes	
2. Article Number (Copy from service label) 7000 2870 0000 7028 2959		
PS Form 3811, July 1999 Domestic Return Receipt 102595-99-M-1789		

U.S. Postal Service
CERTIFIED MAIL RECEIPT
 (Domestic Mail Only; No Insurance Coverage Provided)

OFFICIAL USE

Postage	\$	Postmark Here
Certified Fee		
Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		
Total Postage & Fees	\$	

7000 2870 0000 7028 2959

Sent To	
Tristan Chapman	
Street, Apt. No.; or PO Box No.	
PO Box 130	
City, State, ZIP+ 4	
Clewiston, FL 33440	

PS Form 3800, May 2000 See Reverse for Instructions

1 APPLICANT NAME AND ADDRESS

Southern Gardens Citrus Processing Corporation
 Post Office Box 130
 Clewiston, Florida 33440

Authorized Representative: Tristan Chapman, Vice President and General Manager

2 FACILITY DESCRIPTION, PROJECT DETAILS AND RULE APPLICABILITY

The facility is an existing citrus juice processing facility. The facility currently has a total of thirty-nine citrus juice extractors, one citrus feed mill, two pellet mills with three pellet coolers, four steam boilers, and seven volatile organic liquid storage tanks. The facility is limited to a total fruit processing capacity of 20 million boxes of fruit per year by permit PSD-FL-299.

The existing citrus feed mill consists of one 60,000 pounds per hour, water evaporation rate, peel dryer and one 135,000 pounds per hour, water evaporation rate, waste heat evaporator. The maximum input rate through the citrus feed mill is 47 tons per hour, including the weight of moisture in the pressed peel, on a daily average basis. The mill is fired with No. 6 fuel oil having a maximum sulfur content of 1.5 percent, by weight, and a maximum heat input of 84.0 MMBtu per hour. The peel dryer is permitted to operate up to 6,000 hours per year and emissions are controlled by a wet scrubber.

The applicant 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 with the identical capacities discussed above. The proposed peel dryer will be connected to the existing waste heat evaporator and will operate solely as a backup to the existing peel dryer. Due to the physical limitations associated with the existing waste heat evaporator, both dryers cannot be operated simultaneously. The proposed peel dryer will be vented through the existing waste heat evaporator and stack, which is controlled by a wet scrubber. The applicant did not seek any relaxation in currently enforceable conditions in its other existing emissions units.

The emissions unit addressed by this permit is Backup Peel Dryer No. 2, new emissions unit I.D. -019.

The emissions increases associated with this project were estimated as follows in tons per year. No offsetting emissions were assumed in this estimate.

Pollutant	Net Increase ¹	PSD Significance	Subject to PSD?
PM/ PM ₁₀	0	25/15	No
SO ₂	0	40	No
NO _x	0	40	No
CO	0	100	No
VOC	0	40	No

¹ Since there will be no increase in the current permitted plant processing capacity of 20 million boxes of fruit per year and no increase in the heat input to the dryers, then there will be no net emissions increase as a result of adding a backup peel dryer, when operated as described by the permit application.

The proposed project is subject to preconstruction review requirements under the provisions of Chapter 403, F.S., and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297, F.A.C. The existing facility is located in an area designated, in accordance with Rule 62-204.340, F.A.C., as attainment or unclassifiable for the criteria pollutants ozone, PM₁₀, carbon monoxide, SO₂, nitrogen dioxide and lead. This facility is classified as a Major or Title V Source of air pollution because emissions of at least one regulated air pollutant exceeds 100 tons per year (TPY). The Department has previously found that citrus juice processing facilities such as this facility have potential emissions of VOC exceeding 250 TPY.

This facility is not within an industry included in the list of the 28 Major Facility Categories per Table 212.400-1 of Chapter 62-212, F.A.C. Because emissions are greater than 250 TPY for at least one criteria pollutant (VOC), the facility is also an existing Major Facility with respect to Rule 62-212.400, F.A.C. Prevention of Significant Deterioration (PSD). The net increase in emissions of PM/PM₁₀, NO_x, SO₂, CO and VOC do not exceed the PSD significance levels of Table 212.400-2 of Chapter 62-212, F.A.C. Therefore the project is not subject to PSD requirements of Rule 62-212.400, F.A.C., for these pollutants.

The applicant stated that this facility is a major source of hazardous air pollutants (HAPs). This project is not subject to a case-by-case MACT determination, per Rule 62-204.800(10)(d)2, F.A.C., because it does not result in the construction or reconstruction of a major source of HAP emissions. This project is not subject to any requirements under the National Emissions Standards for Hazardous Air Pollutants, 40 CFR 61 or 63.

3 SOURCE IMPACT ANALYSIS

An impact analysis was not required for this project because it is not subject to the requirements of PSD.

4 EXCESS EMISSIONS

Excess emissions for this emissions unit are specified in Section II of the permit. This permitting action does not change any authorization for excess emissions provided by other Department permits for other emissions units

5 LIMITS AND COMPLIANCE REQUIREMENTS

The permit limits the operation of the proposed peel dryer. Specific emission limits were not imposed because the potential emissions are well below the PSD significance criteria. The operational limits and the compliance requirements are detailed in Section III of the permit.

6 PRELIMINARY DETERMINATION

Based on the foregoing technical evaluation of the application and additional information submitted by the applicant and other available information, the Department has made a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations. The Department's preliminary determination is to issue the draft permit to allow the construction of Backup No. 2 Peel Dryer, subject to the terms and conditions of the draft permit.

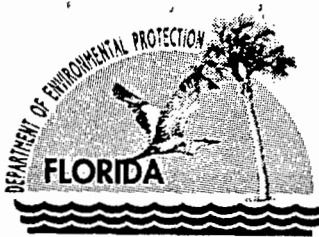
7 FINAL DETERMINATION

An "INTENT TO ISSUE AIR CONSTRUCTION PERMIT" to Southern Gardens Citrus Processing Corporation for their existing citrus juice processing plant located at 833 CR 883, Clewiston, Hendry County was clerked on October 11, 2001. The "PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT" was published in The Clewiston News on October 24, 2001. The Draft Air Construction Permit was available for public inspection at the South District office in Ft. Myers and the permitting authority's office in Tallahassee. Proof of publication of the "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" was received on November 7, 2001.

No comments were received during the fourteen (14) day public comment period. As a result, the Final Air Construction permit will be issued, as noticed.

DETAILS OF THIS ANALYSIS MAY BE OBTAINED BY CONTACTING:

Edward J. Svec, Engineer IV
Department of Environmental Protection
Bureau of Air Regulation
Mail Station #5505
2600 Blair Stone Road
Tallahassee, Florida 32399-2400
Telephone: 850/488-0114



Department of Environmental Protection

Jeb Bush
Governor

Marjory Stoneman Douglas Building
3900 Commonwealth Boulevard
Tallahassee, Florida 32399-3000

David B. Struhs
Secretary

PERMITTEE

Southern Gardens Citrus Processing Corporation
Post Office Box 130
Clewiston, Florida 33440

Permit No.	0510015-008-AC
Project	Backup Peel Dryer No. 2
SIC No.	2037
Expires:	July 31, 2002

Authorized Representative:

Tristan Chapman, Vice President, General Manager

PROJECT AND LOCATION

This permit authorizes Southern Gardens Citrus Processing Corporation, to construct Backup Peel Dryer No. 2 with a heat input capacity of 84 MMBtu/hour or less and a maximum production capacity of 47 tons per hour, including the weight of moisture in the pressed peel, on a daily average basis. This emissions unit is backup to existing Peel Dryer No. 1 and will operate only when Peel Dryer No. 1 is shutdown.

This facility is located at 755 CR 833, Clewiston, Hendry County. The UTM coordinates are: Zone 17; 447.5 km E and 2958.0 km N.

STATEMENT OF BASIS

This construction permit is issued under the provisions of Chapter 403 of the Florida Statutes (F.S.), and the Florida Administrative Code (F.A.C.) Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297. The above named permittee is authorized to construct the emissions units in accordance with the conditions of this permit and as described in the application, approved drawings, plans, and other documents on file with the Department of Environmental Protection (Department).

APPENDICES

The attached appendix is a part of this permit:

Appendix GC General Permit Conditions

Howard L. Rhodes, Director
Division of Air Resources
Management

AIR CONSTRUCTION PERMIT
SECTION I. FACILITY INFORMATION

FACILITY AND PROJECT DESCRIPTION

The existing citrus feed mill consists of one 60,000 pounds per hour, water evaporation rate, peel dryer and one 135,000 pounds per hour, water evaporation rate, waste heat evaporator. The maximum input rate through the citrus feed mill is 47 tons per hour, including the weight of moisture in the pressed peel, on a daily average basis. The mill is fired with No. 6 fuel oil having a maximum sulfur content of 1.5 percent, by weight, and a maximum heat input of 84.0 MMBtu per hour. The peel dryer is permitted to operate up to 6,000 hours per year and emissions are controlled by a wet scrubber.

The applicant 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 with the identical capacities discussed above. The proposed peel dryer will be connected to the existing waste heat evaporator and will operate solely as a backup to the existing peel dryer. Due to the physical limitations associated with the existing waste heat evaporator, both dryers cannot be operated simultaneously. The proposed peel dryer will be vented through the existing waste heat evaporator and stack, which is controlled by a wet scrubber referenced above. The applicant did not seek any relaxation in currently enforceable conditions in its other existing emissions units.

The emissions increases associated with this project were estimated as follows in tons per year. No offsetting emissions were assumed in this estimate.

Pollutant	Net Increase ¹	PSD Significance	Subject to PSD?
PM/ PM ₁₀	0	25/15	No
SO ₂	0	40	No
NOx	0	40	No
CO	0	100	No
VOC	0	40	No

¹ Since there will be no increase in the current permitted plant processing capacity of 20 million boxes of fruit per year and no increase in the heat input to the dryers, then there will be no net emissions increase as a result of adding a backup peel dryer, when operated as described by the permit application.

The facility information, project scope, emissions and rule applicability are described in detail in the Department's Technical Evaluation and Determination.

REVIEWING AND PROCESS SCHEDULE

July 9, 2001	Received permit application (no application fee required)
September 25, 2001	Application complete
October 11, 2001	Distributed Notice of Intent to Issue and supporting documents
October 24, 2001	Notice of Intent published in The Clewiston News, Clewiston, Hendry County

RELEVANT DOCUMENTS

The documents listed below are the basis of the permit. They are specifically related to this permitting action. These documents are on file with the Department.

- Permit application
- Department's Technical Evaluation and Determination
- Department's Intent to Issue

AIR CONSTRUCTION PERMIT

SECTION II. FACILITY-WIDE SPECIFIC CONDITIONS

The following specific conditions apply to all emissions units at this facility addressed by this permit.

ADMINISTRATIVE

1. Regulating Agencies: All documents related to applications for permits to construct, operate or modify an emissions unit should be submitted to the Bureau of Air Regulation (BAR), Florida Department of Environmental Protection at Mail Station #5505, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, phone number 850/488-0114. All documents related to reports, tests, minor modifications and notifications shall be submitted to the Department's South District office at 2295 Victoria Avenue, Suite 364W, Fort Myers, Florida 33901, and phone number 941/332-6975.
2. General Conditions: The owner and operator is subject to and shall operate under the attached General Permit Conditions G.1 through G.15 listed in Appendix GC of this permit. General Permit Conditions are binding and enforceable pursuant to Chapter 403, F.S. [Rule 62-4.160, F.A.C.]
3. Terminology: The terms used in this permit have specific meanings as defined in the corresponding chapters of the Florida Administrative Code.
4. Applicable Regulations, Forms and Application Procedures: Unless otherwise indicated in this permit, the construction and operation of the subject emissions unit shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of Chapter 403, F.S.; Chapters 62-4, 62-110, 62-204, 62-212, 62-213, 62-296, 62-297, F.A.C.; and, the Code of Federal Regulations Title 40, Part 60, adopted by reference in the F.A.C. regulations. The permittee shall use the applicable forms listed in Rule 62-210.900, F.A.C. and follow the application procedures in Chapter 62-4, F.A.C. Issuance of this permit does not relieve the facility owner or operator from compliance with any applicable federal, state, or local permitting or regulations. [Rules 62-204.800, 62-210.300 and 62-210.900, F.A.C.]
5. New or Additional Conditions: Pursuant to Rule 62-4.080, F.A.C., for good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]
6. Expiration: This air construction permit shall expire on July 31, 2002. The permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the Department's Bureau of Air Regulation prior to 60 days before the expiration of the permit. [Rules 62-210.300(1), 62-4.070(4), 62-4.080, and 62-4.210, F.A.C.]
7. Modifications: No emissions unit or facility subject to this permit shall be constructed or modified without obtaining an air construction permit from the Department. Such permit must be obtained prior to the beginning of construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]
8. Title V Operation Permit Required: This permit authorizes construction and/or installation of the permitted emissions unit and initial operation to determine compliance with Department rules. A revision to the Title V operation permit is required for regular operation of the permitted emissions unit. The owner or operator shall apply for a Title V operation permit at least ninety days prior to expiration of this permit, but no later than 180 days after commencing operation. To apply for a

AIR CONSTRUCTION PERMIT

SECTION II. FACILITY-WIDE SPECIFIC CONDITIONS

Title V operation permit, the applicant shall submit the appropriate application form, compliance test results, and such additional information as the Department may by law require. The application shall be submitted to the Department's South District office. [Rules 62-4.030, 62-4.050, 62-4.220, and Chapter 62-213, F.A.C.]

OPERATIONAL REQUIREMENTS

9. Plant Operation - Problems: If temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by hazard of fire, wind or by other cause, the permittee shall immediately notify the Department's South District office. The notification shall include pertinent information as to the cause of the problem, and what steps are being taken to correct the problem and to prevent its recurrence, and where applicable, the owner's intent toward reconstruction of destroyed facilities. Such notification does not release the permittee from any liability for failure to comply with Department rules. [Rule 62-4.130, F.A.C.]
10. Circumvention: No person shall circumvent any air pollution control device or allow the emission of air pollutants without the applicable air pollution control device operating properly. [Rule 62-210.650, F.A.C.]
11. Excess Emissions: This permit does not change any authorization for excess emissions provided by other Department permits for other emissions units. The following excess emissions provisions of state rule apply to this emissions unit (emissions unit 019) as specified below.
 - (a) Excess emissions resulting from start-up and shutdown are permitted for emissions unit 019 providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized, but in no case exceed two hours in any 24 hour period.
 - (b) Excess emissions resulting from malfunction of this emissions unit shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized, but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration.
 - (c) Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during start-up, shutdown, or malfunction shall be prohibited.

[Rules 62-210.700(1), (4) and (5), F.A.C.]

COMPLIANCE MONITORING AND TESTING REQUIREMENTS

12. Determination of Process Variables: [Rule 62-297.310(5), F.A.C.]
 - (a) Required Equipment. The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.
 - (b) Accuracy of Equipment. Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank

AIR CONSTRUCTION PERMIT

SECTION II. FACILITY-WIDE SPECIFIC CONDITIONS

scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.

REPORTING AND RECORD KEEPING REQUIREMENTS

13. Duration of Record Keeping: Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least five years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule. [Rules 62-4.160(14)(a)&(b) and 62-213.440(1)(b)2.b., F.A.C.]
14. Excess Emissions Report: In case of excess emissions resulting from malfunction, the owner or operator shall notify the Department's South District office within one working day of: the nature, extent, and duration of the excess emissions; the cause of the excess emissions; and the actions taken to correct the problem. In addition, the Department may request a written summary report of the incident. A full written report on the malfunctions shall be submitted in a quarterly report if requested by the Department. [Rules 62-4.130 and 62-210.700(6), F.A.C.]
15. Annual Operating Report for Air Pollutant Emitting Facility: The Annual Operating Report for Air Pollutant Emitting Facility shall be completed each year and shall be submitted to the Department's South District office and, if applicable, the appropriate local program by March 1 of the following year. [Rule 62-210.370(3), F.A.C.]

AIR CONSTRUCTION PERMIT

SECTION III. EMISSIONS UNITS SPECIFIC CONDITIONS

The following specific conditions apply to the following emissions units after construction.

EMISSIONS UNIT NO.	EMISSIONS UNIT DESCRIPTION
019	Backup Peel Dryer No. 2

[Note: This emissions unit is subject to the requirements of the state rules as indicated in this permit. This permit does not change the particulate emission limit of Rule 62-296.320(4)(a), F.A.C., (process weight table) or annual compliance testing frequency established by previous permits. This permit limits the input of pressed (wet) peel in order to limit potential emissions of PM/PM₁₀ to 32.05 pounds per hour and 96.15 tons per year. All PM is assumed to be PM₁₀.]

OPERATIONAL REQUIREMENTS

1. Hours of Operation: This emissions unit and existing Peel Dryer No. 1 (Emissions Unit I.D. No. – 003) shall operate no more than 6,000 total hours during any consecutive 12 month period. This emissions unit shall operate only when existing Peel Dryer No. 1 (Emissions Unit I.D. No. –003) is shutdown. [Rules 62-4.070(3), 62-210.200 and 62-212.400, F.A.C., limitation on potential to emit and assumptions relied upon for net emissions increase calculations]
2. Operation Limited: The rate of pressed peel input to the dryer shall not exceed 47 tons per hour, including the weight of moisture in the pressed peel, on a daily average basis. [Rules 62-4.070(3) and 62-212.400, F.A.C., limitation on potential to emit and assumptions relied upon for net emissions increase calculations]

EMISSION LIMITING STANDARDS

3. General Visible Emissions Standard: Except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, no person shall cause, let, permit, suffer, or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20% opacity). The test method for visible emissions shall be EPA Method 9, incorporated and adopted by reference in Chapter 62-297, F.A.C. Test procedures shall meet all applicable requirements of Chapter 62-297, F.A.C. [Rule 62-296.320(4)(b)1, F.A.C.]

REPORTING AND RECORD KEEPING REQUIREMENTS

4. Records of Operating Hours Required: The owner or operator shall make and maintain records of hours of operation of this emissions unit in units of hours per month and hours per consecutive 12 month period, to demonstrate compliance with the limit of condition 1 of this section. Records shall be made from daily operation records and shall be completed no later than the 10th day of each following month. [Rule 62-4.070(3), F.A.C., required to monitor compliance with the limitation on potential to emit]
5. Records of Input Rate Required: The owner or operator shall make and maintain records of the average rate of pressed peel input to the dryer, to demonstrate compliance with the requirements of condition 2 of this section. Records shall be made each day by dividing that day's total input rate of peel by that day's hours of operation of the dryer. [Rule 62-4.070(3), F.A.C., required to monitor compliance with the limitation on potential to emit]

AIR CONSTRUCTION PERMIT

SECTION III. EMISSIONS UNITS SPECIFIC CONDITIONS

6. Records of Operation of Dryer Bypass Stack Required: The owner or operator shall make records of the number of hours each day that the dryer is operated with emissions directed in total or in part through the bypass stack. The number of hours of bypass stack operation recorded each calendar quarter shall be reported to the Department's South District office no later than the 10th day following each calendar quarter. [Rule 62-4.070(3), F.A.C.]

[Note: Excess emissions are limited by Rule 62-210.700, F.A.C., and previous Department permits. Those limitations are not changed by this permit.]

APPENDIX GC
GENERAL PERMIT CONDITIONS [RULE 62-4.160, F.A.C.]

- G.1 The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
- G.2 This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings or exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
- G.3 As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey and vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
- G.4 This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
- G.5 This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
- G.6 The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
- G.7 The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:
- (a) Have access to and copy and records that must be kept under the conditions of the permit;
 - (b) Inspect the facility, equipment, practices, or operations regulated or required under this permit, and,
 - (c) Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.
- Reasonable time may depend on the nature of the concern being investigated.
- G.8 If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:
- (a) A description of and cause of non-compliance; and
 - (b) The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

APPENDIX GC
GENERAL PERMIT CONDITIONS [RULE 62-4.160, F.A.C.]

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

- G.9 In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.
- G.10 The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.
- G.11 This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.
- G.12 This permit or a copy thereof shall be kept at the work site of the permitted activity.
- G.13 This permit also constitutes:
- (a) Determination of Best Available Control Technology ();
 - (b) Determination of Prevention of Significant Deterioration (); and
 - (c) Compliance with New Source Performance Standards ().
- G.14 The permittee shall comply with the following:
- (a) Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
 - (b) The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application or this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
 - (c) Records of monitoring information shall include:
 - 1. The date, exact place, and time of sampling or measurements;
 - 2. The person responsible for performing the sampling or measurements;
 - 3. The dates analyses were performed;
 - 4. The person responsible for performing the analyses;
 - 5. The analytical techniques or methods used; and
 - 6. The results of such analyses.
- G.15 When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

Memorandum

Florida Department of Environmental Protection

TO: Howard Rhodes

FROM: Clair Fancy *CF*

DATE: November 9, 2001

SUBJECT: Southern Gardens Citrus Processing Corporation
Backup Peel Dryer No. 2
0510015-008-AC

Attached for approval and signature is a final air construction permit for the installation of 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 with the identical capacities of the existing peel dryer. The proposed peel dryer will be connected to the existing waste heat evaporator and will operate solely as a backup to the existing peel dryer. Due to the physical limitations associated with the existing waste heat evaporator, both dryers cannot be operated simultaneously. The proposed peel dryer will be vented through the existing waste heat evaporator and stack, which is controlled by a wet scrubber referenced above. The applicant did not seek any relaxation in currently enforceable conditions in its other existing emissions units. There will be no emission increases due to this project.

The applicant did not seek any relaxation in currently enforceable conditions in its other existing emissions units.

This project is not subject to PSD because the associated emissions increases are not significant for PSD. There will be no actual emission increases due to this project.

No comments were received during the public comment period.

I recommend your approval and signature.

February 5, 2002 is day 90 day.

Attachments

/es

The Clewiston News

Published Weekly

Clewiston, Florida

AFFIDAVIT OF PUBLICATION

State of Florida
County of Hendry

Before the undersigned authority, personally appeared Debra Miller, who on oath says she is the Editor of the Clewiston News, a weekly newspaper published at Clewiston in Hendry County, Florida, that the attached copy of advertisement being a Public Notice in the matter of Intent to Issue Air Construction Permit

_____ in the _____ court, was published in said newspaper in the issue(s) of October 24, 2001

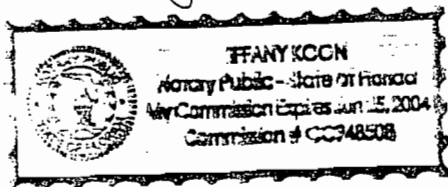
Affiant further says that the said Clewiston News is a newspaper published at Clewiston, in said Hendry County, continuously published in said Hendry County, Florida, each week, and has been entered as periodicals matter at the post office in Clewiston, in said Hendry County, Florida, for a period of one year next preceding the first publication says that she 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.

Debra Miller

Sworn to and subscribed before me this 24 day of Oct 2001

Siffany Koon

Notary Public



cc: [unclear]
[unclear], SD

RECEIVED
OCT 27 2001
BUREAU OF AIR REGULATION

PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION DEP File No. 0510015-008-AC Southern Gardens Citrus Processing Corporation Hendry County

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit to Southern Gardens Citrus Processing Corporation for its existing citrus office processing facility located at 755 CR 833, Clewiston, Hendry County. The applicant's mailing address is: Post Office Box 130, Clewiston, Florida 33440. The permit is to authorize the installation of 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 with the identical capacities of the existing peel dryer. The proposed peel dryer will be connected to the existing waste heat evaporator and will operate solely as a backup to the existing peel dryer. Due to the physical limitations associated with the existing waste heat evaporator, both dryers cannot be operated simultaneously. The proposed peel dryer will be vented through the existing waste heat evaporator and stack, which is controlled by a wet scrubber referenced above. The applicant did not seek any relaxation in currently enforceable conditions in its other existing emissions units. There will be no actual emission increases due to this project.

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

The Department will accept written comments concerning the proposed permit issuance action for a period of fourteen (14) days from the date of publication of this Public Notice of Intent to Issue Air Construction Permit. Written comments should be provided to the Department's Bureau of Air Regulation at 2600 Blair Stone Road, Mail 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 in 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 Sections 120.569 and 120.57, Florida Statutes (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 Section 120.569 and 120.57, F.S. 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, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Department for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the 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 request an administrative determination (hearing) under Section 120.569 and 120.57 F.S. or to intervene in this proceeding and participate as a party to it. Any subsequent intervenor will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28.106.205, Florida Administrative Code (F.A.C.)

A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each 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, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and (g) A statement of the relief sought by the petitioner, stating the action petitioner wishes 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 action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301 F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the Departments 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, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:


Dept. of Environmental Protection
Bureau of Air Regulation
Suite 4, 111 S. Magnolia Drive
Tallahassee, Florida 32301
Telephone: 850/488-0114
Fax: 850/922-6979
Dept. of Environmental Protection
South District
2295 Victoria Avenue, Suite 364W
Fort Myers, Florida 33901
Telephone: 941/332-6975

The complete project file includes the application, technical evaluation, draft permit, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Administrator, Title V Section, or the Department's reviewing engineer for this project, Edward J. Svec, Engineer IV, at the Bureau of Air Regulation in Tallahassee, Florida, or call 850/488-0114, for additional information. Written comments directed to the Department's reviewing engineer should be sent to the following mailing address: Dept. of Environmental Protection, Bureau of Air Regulation, Mail Station #5505, Tallahassee, Florida 32399-2400. 235481 - CN 10/24/01

Florida Department of
Environmental Protection

Memorandum

TO: File 0510015-008-AC

FROM: Edward Svec 

DATE: October 19, 2001

SUBJECT: Public Notice

Yesterday I received a copy of the proof of publication from the South District. The newspaper notice had the incorrect project number. I called Mr. Derek Pridgen of Southern Gardens Citrus this morning and informed him of the newspaper's error. He agreed to have the public notice republished.

RECEIVED

OCT 18 2001

D.E.P. - South District

**SOUTHERN
GARDENS**
CITRUS

October 17, 2001

Department of Environmental Protection
Attn: David M. Knowles, P.E.
P.O. Box 2549
Fort Myers, FL 33902-2549

Dear Mr. Knowles

Enclosed you will find our Affidavit of Publication for the Public Notice of Intent that was published in the Clewiston News Paper, on October 17, 2001, it was in regards to our Air Construction Permit.

If any questions should arise I can be contacted at (863) 902-4109.

Thank You,



Olga Rodriguez
Environmental Resource

The Clewiston News

Published Weekly

Clewiston, Florida

AFFIDAVIT OF PUBLICATION

State of Florida
County of Hendry

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

Public Notice in the matter of Intent to Issue Air Construction Permit DEP File No. 0510015-006-AC

in the court, was published in said newspaper in the issue(s) of October 17, 2001

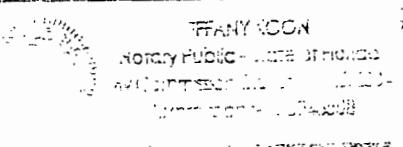
Affiant further says that the said Clewiston News is a newspaper published at Clewiston, in said Hendry County, continuously published in said Hendry County, Florida, each week, and has been entered as periodicals matter at the post office in Clewiston, in said Hendry County, Florida, for a period of one year next preceding the first publication says that she 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.

Debra Miller (handwritten signature)

Sworn to and subscribed before me this 17 day of October, 2001

Liffany Koon (handwritten signature)

Notary Public



Dept. of Environmental Protection
South District
2295 Victoria Avenue, Suite 346W
Fort Myers, Florida 33901
Telephone: 941/332-6975

The complete project file includes the application, technical evaluation, draft permit, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111.F.S. Interested persons may contact the Administrator, Title V Section, or the Department's reviewing engineer for this project, Edward J. Svec, Engineer IV, at the Bureau of Air Regulation in Tallahassee, Florida, or call 850/488-0114, for additional information. Written comments directed to the Department's reviewing engineer should be sent to the following mailing address: Dept. of Environmental Protection, Bureau of Air Regulation, Mail Station #5505, Tallahassee, Florida 32399-2400. 233283 - CN 10/17/01

PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
DEP File No. 0510015-006-AC
Southern Gardens Citrus Processing Corporation
Hendry County

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit to Southern Gardens Citrus Processing Corporation for its existing citrus office processing facility located at 755 CR 833, Clewiston, Hendry County. The applicant's mailing address is: Post Office Box 130, Clewiston, Florida 33440. The permit is to authorize the installation of a used fryer 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 with the identical capacities of the existing peel dryer. The proposed peel dryer will be connected to the existing waste heat evaporator and will operate solely as a backup to the existing peel dryer. Due to the physical limitations associated with the existing waste heat evaporator, both dryers cannot be operated simultaneously. The proposed peel dryer will be vented through the existing waste heat evaporator and stack, which is controlled by a wet scrubber referenced above. The applicant did not seek any relaxation in currently enforceable conditions in its other existing emissions units. There will be no actual emission increases due to this project.

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

The Department will accept written comments concerning the proposed permit issuance action for a period of fourteen (14) days from the date of publication of this Public Notice of Intent to Issue Air Construction Permit. Written comments should be provided to the Department's Bureau of Air Regulation at 2600 Blair Stone Road, Mail 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 in 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 Sections 120.569 and 120.57, Florida Statutes (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 Section 120.569 and 120.57, F.S. 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, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Department for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the 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 request an administrative determination (hearing) under Section 120.569 and 120.57 F.S. or to intervene in this proceeding and participate as a party to it. Any subsequent intervenes will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28.106.205, Florida Administrative Code (F.A.C.)

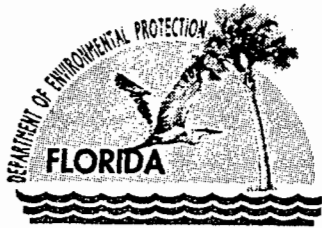
A petition that disputes the material facts upon which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner, the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and (g) A statement of the relief sought by the petitioner, stating the action petitioner wishes 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 action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301 F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the Departments 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, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Dept. of Environmental Protection
Bureau of Air Regulation
Suite 4, 111 S. Magnolia Drive
Tallahassee, Florida 32301
Telephone: 850/488-0114
Fax: 850/922-6979



Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

October 10, 2001

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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

Re: DEP File No. 0510015-008-AC
Backup Peel Dryer No. 2


Dear Mr. Chapman:

Enclosed is one copy of the draft air construction permit to Southern Gardens Citrus Processing Corporation to construct a backup peel dryer at its citrus juice processing plant located at 755 CR 883, Clewiston, Hendry County. The Technical Evaluation and Determination, the Department's Intent to Issue Air Construction Permit and the Public Notice of Intent to Issue Air Construction Permit are also included.

The Public Notice of Intent to Issue Air Construction Permit must be published one time only, as soon as possible, in the legal advertisement section of a newspaper of general circulation in the area affected, pursuant to the requirements Chapter 50, Florida Statutes. Proof of publication, i.e., newspaper affidavit, must be provided to the Department's Bureau of Air Regulation office within seven days of publication. Failure to publish the notice and provide proof of publication may result in the denial of the permit.

Please submit any written comments you wish to have considered concerning the Department's proposed action to Scott M. Sheplak, P.E., Administrator, Title V Section at the above letterhead address. If you have any other questions, please contact Edward J. Svec at 850/921-8985.

Sincerely,


C. H. Fancy, P.E., Chief
Bureau of Air Regulation

CHF/es

Enclosures

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none"> 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. 	A. Received by (Please Print Clearly)	B. Date of Delivery 10-15-01
	C. Signature X <i>Rudman Salvo</i> <input type="checkbox"/> Agent <input type="checkbox"/> Addressee	
1. Article Addressed to: Mr. Tristan Chapman Vice President, General Manager Southern Gardens Citrus Processing Corporation Post Office Box 130 Clewiston, Florida 33440	D. Is delivery address different from item 1? If YES, enter delivery address below: <input type="checkbox"/> Yes <input type="checkbox"/> No	
2. Article Number (Copy from service label) 7000 0520 0020 9371 1625	3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.	
	4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes	
PS Form 3811, July 1999 Domestic Return Receipt 10250 00-M-0852		

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

5250 1625
7000 0520 0020 9371 1625

Mr. Tristan Chapman

Postage	\$	Postmark Here
Certified Fee		
Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		
Total Postage & Fees	\$	

Recipient's Name (Please Print Clearly) (To be completed by mailer)
Mr. Tristan Chapman
Street, Apt. No., or PO Box No.
Post Office Box 130
City, State, ZIP+4
Clewiston, Florida 33440

PS Form 3800, February 2000 See Reverse for Instructions

In the Matter of an
Application for Permit by:

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

DEP File NO. 0510015-008-AC
Backup Peel Dryer
Hendry County

INTENT TO ISSUE AIR CONSTRUCTION PERMIT

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit (copy of draft permit attached) for the proposed project, detailed in the application specified above and the enclosed Technical Evaluation and Preliminary Determination, for the reasons stated below.

The applicant, Southern Gardens Citrus Processing Corporation, applied on July 9, 2001, to the Department for an air construction permit for its existing citrus juice processing facility located at 833 CR 883, Clewiston, Hendry County. The application requested approval, as a non-PSD project, to construct an additional peel dryer/waste heat evaporator and a pellet mill and cooler. In response to a request for additional information, the applicant amended the scope of the application on September 25, 2001, and requested to construct only a backup peel dryer. The proposed unit will be of identical capacity to the existing peel dryer and will utilize the existing waste heat evaporator. No simultaneous operation of the two peel dryers has been requested. The proposed project is not subject to the requirements of Prevention of Significant Deterioration.

The Department has permitting jurisdiction under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, and 62-212. The above actions are not exempt from permitting procedures. The Department has determined that an air construction permit is required to perform the proposed work.

The Department intends to issue this air construction permit based on the belief that reasonable assurances have been provided to indicate that operation of these emission units will not adversely impact air quality, and the emission units will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C.

Pursuant to Section 403.815, F.S., and Rule 62-110.106(7)(a)1., F.A.C., you (the applicant) are required to publish at your own expense the enclosed Public Notice of Intent to Issue Air Construction Permit. The notice shall be published one time only in the legal advertisement section of a newspaper of general circulation in the area affected. Rule 62-110.106(7)(b), F.A.C., requires that the applicant cause the notice to be published as soon as possible after notification by the Department of its intended action. For the purpose of these rules, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. If you are uncertain that a newspaper meets these requirements, please contact the Department at the address or telephone number listed below. The applicant shall provide proof of publication to the Department's Bureau of Air Regulation, at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400 (Telephone: 850/488-0114; Fax: 850/922-6979). You must provide proof of publication within seven days of publication, pursuant to Rule 62-110.106(5), F.A.C. No permitting action for which published notice is required shall be granted until proof of publication of notice is made by furnishing a uniform affidavit in substantially the form prescribed in Section 50.051, F.S. to the office of the Department issuing the permit. Failure to publish the notice and provide proof of publication may result in the denial of the permit pursuant to Rules 62-110.106(9) & (11), F.A.C.

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 significant change of terms or conditions.

The Department will accept written comments concerning the proposed permit issuance action for a period of fourteen (14) days from the date of publication of Public Notice of Intent to Issue Air Permit. Written comments should be provided to the Department's Bureau of Air Regulation at 2600 Blair Stone Road, Mail 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 in 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 Sections 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.

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, F.S. 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, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S. must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Department for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the 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 request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each 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, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes 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 action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision 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.

Mediation is not available in this proceeding.

In addition to the above, a person subject to regulation has a right to apply for a variance from or waiver of the requirements of particular rules, on certain conditions, under Section 120.542, F.S. The relief provided by this state statute applies only to state rules, not statutes, and not to any federal regulatory requirements. Applying for a variance or waiver does not substitute or extend the time for filing a petition for an administrative hearing or exercising any other right that a person may have in relation to the action proposed in this notice of intent.


The application for a variance or waiver is made by filing a petition with the Office of General Counsel of the Department, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. The petition must specify the following information: (a) The name, address, and telephone number of the petitioner; (b) The name, address, and telephone number of the attorney or qualified representative of the petitioner, if any; (c) Each rule or portion of a rule from which a variance or waiver is requested; (d) The citation to the statute underlying (implemented by) the rule identified in (c) above; (e) The type of action requested; (f) The specific facts that would justify a variance or waiver for the petitioner; (g) The reason why the variance or waiver would serve the purposes

of the underlying statute (implemented by the rule); and (h) A statement whether the variance or waiver is permanent or temporary and, if temporary, a statement of the dates showing the duration of the variance or waiver requested.

The Department will grant a variance or waiver when the petition demonstrates both that the application of the rule would create a substantial hardship or violate principles of fairness, as each of those terms is defined in Section 120.542(2), F.S., and that the purpose of the underlying statute will be or has been achieved by other means by the petitioner.

Persons subject to regulation pursuant to any federally delegated or approved air program should be aware that Florida is specifically not authorized to issue variances or waivers from any requirements of any such federally delegated or approved program. The requirements of the program remain fully enforceable by the Administrator of the EPA and by any person under the Clean Air Act unless and until the Administrator separately approves any variance or waiver in accordance with the procedures of the federal program.

Executed in Tallahassee, Florida.


C. H. Fancy, P.E., Chief
Bureau of Air Regulation

CERTIFICATE OF SERVICE

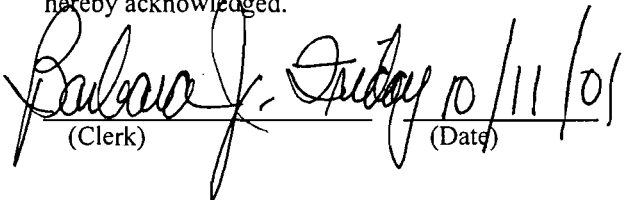
The undersigned duly designated deputy agency clerk hereby certifies that this Intent to Issue Air Construction Permit (including the Public Notice of Intent to Issue Air Construction Permit, Technical Evaluation and Preliminary Determination, and the Draft permit) was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 10/11/01 to the person(s) listed:

Mr. Tristan Chapman, Southern Gardens Citrus Processing Corporation *
Mr. David Buff, P.E., Golder Associates
Mr. Ron Blackburn, P.E., DEP SD

10/11/01 cc: Ed Svec
Reading File

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to §120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.


(Clerk) Friday 10/11/01 (Date)

PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

DEP File No. 0510015-008-AC

Southern Gardens Citrus Processing Corporation
Hendry County

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit to Southern Gardens Citrus Processing Corporation for its existing citrus juice processing facility located at 755 CR 833, Clewiston, Hendry County. The applicant's mailing address is: Post Office Box 130, Clewiston, Florida 33440. The permit is to authorize the installation of 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 with the identical capacities of the existing peel dryer. The proposed peel dryer will be connected to the existing waste heat evaporator and will operate solely as a backup to the existing peel dryer. Due to the physical limitations associated with the existing waste heat evaporator, both dryers cannot be operated simultaneously. The proposed peel dryer will be vented through the existing waste heat evaporator and stack, which is controlled by a wet scrubber referenced above. The applicant did not seek any relaxation in currently enforceable conditions in its other existing emissions units. There will be no actual emission increases due to this project.

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 significant change of terms or conditions.

The Department will accept written comments concerning the proposed permit issuance action for a period of fourteen (14) days from the date of publication of this Public Notice of Intent to Issue Air Construction Permit. Written comments should be provided to the Department's Bureau of Air Regulation at 2600 Blair Stone Road, Mail 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 in 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 Sections 120.569 and 120.57, Florida Statutes (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, F.S. 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, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Department for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the 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 request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, Florida Administrative Code (F.A.C.).

A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each 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

NOTICE TO BE PUBLISHED IN THE NEWSPAPER

PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

DEP File No. 0510015-008-AC

Southern Gardens Citrus Processing Corporation
Hendry County

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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 significant change of terms or conditions.

The Department will accept written comments concerning the proposed permit issuance action for a period of fourteen (14) days from the date of publication of this Public Notice of Intent to Issue Air Construction Permit. Written comments should be provided to the Department's Bureau of Air Regulation at 2600 Blair Stone Road, Mail 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 in 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 Sections 120.569 and 120.57, Florida Statutes (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, F.S. 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, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Department for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the 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 request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, Florida Administrative Code (F.A.C.).

A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each 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

NOTICE TO BE PUBLISHED IN THE NEWSPAPER

the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes 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 action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision 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, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Dept. of Environmental Protection
Bureau of Air Regulation
Suite 4, 111 S. Magnolia Drive
Tallahassee, Florida 32301
Telephone: 850/488-0114
Fax: 850/922-6979

Dept. of Environmental Protection
South District
2295 Victoria Avenue, Suite 364W
Fort Meyers, Florida 33901
Telephone: 941/332-6975

The complete project file includes the application, technical evaluation, draft permit, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Administrator, Title V Section, or the Department's reviewing engineer for this project, Edward J. Svec, Engineer IV, at the Bureau of Air Regulation in Tallahassee, Florida, or call 850/488-0114, for additional information. Written comments directed to the Department's reviewing engineer should be sent to the following mailing address: Dept. of Environmental Protection, Bureau of Air Regulation, Mail Station #5505, Tallahassee, Florida, 32399-2400.

NOTICE TO BE PUBLISHED IN THE NEWSPAPER



Department of Environmental Protection

Jeb Bush
Governor

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

David B. Struhs
Secretary

PERMITTEE

Southern Gardens Citrus Processing Corporation
Post Office Box 130
Clewiston, Florida 33440

Permit No.	0510015-008-AC
Project	Backup Peel Dryer No. 2
SIC No.	2037
Expires:	^DRAFT

Authorized Representative:

Tristan Chapman, Vice President, General Manager

PROJECT AND LOCATION

This permit authorizes Southern Gardens Citrus Processing Corporation, to construct Backup Peel Dryer No. 2 with a heat input capacity of 84 MMBtu/hour or less and a maximum production capacity of 47 tons per hour, including the weight of moisture in the pressed peel, on a daily average basis. This emissions unit is backup to existing Peel Dryer No. 1 and will operate only when Peel Dryer No. 1 is shutdown.

This facility is located at 755 CR 833, Clewiston, Hendry County. The UTM coordinates are: Zone 17; 447.5 km E and 2958.0 km N.

STATEMENT OF BASIS

This construction permit is issued under the provisions of Chapter 403 of the Florida Statutes (F.S.), and the Florida Administrative Code (F.A.C.) Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297. The above named permittee is authorized to construct the emissions units in accordance with the conditions of this permit and as described in the application, approved drawings, plans, and other documents on file with the Department of Environmental Protection (Department).

APPENDICES

The attached appendix is a part of this permit:

Appendix GC General Permit Conditions

DRAFT

Howard L. Rhodes, Director
Division of Air Resources
Management

AIR CONSTRUCTION PERMIT
SECTION I. FACILITY INFORMATION

FACILITY AND PROJECT DESCRIPTION

The existing citrus feed mill consists of one 60,000 pounds per hour, water evaporation rate, peel dryer and one 135,000 pounds per hour, water evaporation rate, waste heat evaporator. The maximum input rate through the citrus feed mill is 47 tons per hour, including the weight of moisture in the pressed peel, on a daily average basis. The mill is fired with No. 6 fuel oil having a maximum sulfur content of 1.5 percent, by weight, and a maximum heat input of 84.0 MMBtu per hour. The peel dryer is permitted to operate up to 6,000 hours per year and emissions are controlled by a wet scrubber.

The applicant 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 with the identical capacities discussed above. The proposed peel dryer will be connected to the existing waste heat evaporator and will operate solely as a backup to the existing peel dryer. Due to the physical limitations associated with the existing waste heat evaporator, both dryers cannot be operated simultaneously. The proposed peel dryer will be vented through the existing waste heat evaporator and stack, which is controlled by a wet scrubber referenced above. The applicant did not seek any relaxation in currently enforceable conditions in its other existing emissions units.

The emissions increases associated with this project were estimated as follows in tons per year. No offsetting emissions were assumed in this estimate.

Pollutant	Net Increase ¹	PSD Significance	Subject to PSD?
PM/ PM ₁₀	0	25/15	No
SO ₂	0	40	No
NO _x	0	40	No
CO	0	100	No
VOC	0	40	No

¹ Since there will be no increase in the current permitted plant processing capacity of 20 million boxes of fruit per year and no increase in the heat input to the dryers, then there will be no net emissions increase as a result of adding a backup peel dryer, when operated as described by the permit application.

The facility information, project scope, emissions and rule applicability are described in detail in the Department's Technical Evaluation and Determination.

REVIEWING AND PROCESS SCHEDULE

July 9, 2001	Received permit application (no application fee required)
September 25, 2001	Application complete
^DRAFT	Distributed Notice of Intent to Issue and supporting documents
^DRAFT	Notice of Intent published in ^DRAFT

RELEVANT DOCUMENTS

The documents listed below are the basis of the permit. They are specifically related to this permitting action. These documents are on file with the Department.

- Permit application
- Department's Technical Evaluation and Determination
- Department's Intent to Issue

AIR CONSTRUCTION PERMIT
SECTION II. FACILITY-WIDE SPECIFIC CONDITIONS

The following specific conditions apply to all emissions units at this facility addressed by this permit.

ADMINISTRATIVE

1. Regulating Agencies: All documents related to applications for permits to construct, operate or modify an emissions unit should be submitted to the Bureau of Air Regulation (BAR), Florida Department of Environmental Protection at Mail Station #5505, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, phone number 850/488-0114. All documents related to reports, tests, minor modifications and notifications shall be submitted to the Department's South District office at 2295 Victoria Avenue, Suite 364W, Fort Meyers, Florida 33901, and phone number 941/332-6975.
2. General Conditions: The owner and operator is subject to and shall operate under the attached General Permit Conditions G.1 through G.15 listed in Appendix GC of this permit. General Permit Conditions are binding and enforceable pursuant to Chapter 403, F.S. [Rule 62-4.160, F.A.C.]
3. Terminology: The terms used in this permit have specific meanings as defined in the corresponding chapters of the Florida Administrative Code.
4. Applicable Regulations, Forms and Application Procedures: Unless otherwise indicated in this permit, the construction and operation of the subject emissions unit shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of Chapter 403, F.S.; Chapters 62-4, 62-110, 62-204, 62-212, 62-213, 62-296, 62-297, F.A.C.; and, the Code of Federal Regulations Title 40, Part 60, adopted by reference in the F.A.C. regulations. The permittee shall use the applicable forms listed in Rule 62-210.900, F.A.C. and follow the application procedures in Chapter 62-4, F.A.C. Issuance of this permit does not relieve the facility owner or operator from compliance with any applicable federal, state, or local permitting or regulations. [Rules 62-204.800, 62-210.300 and 62-210.900, F.A.C.]
5. New or Additional Conditions: Pursuant to Rule 62-4.080, F.A.C., for good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]
6. Expiration: This air construction permit shall expire on ^DRAFT. The permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the Department's Bureau of Air Regulation prior to 60 days before the expiration of the permit. [Rules 62-210.300(1), 62-4.070(4), 62-4.080, and 62-4.210, F.A.C.]
7. Modifications: No emissions unit or facility subject to this permit shall be constructed or modified without obtaining an air construction permit from the Department. Such permit must be obtained prior to the beginning of construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]
8. Title V Operation Permit Required: This permit authorizes construction and/or installation of the permitted emissions unit and initial operation to determine compliance with Department rules. A revision to the Title V operation permit is required for regular operation of the permitted emissions unit. The owner or operator shall apply for a Title V operation permit at least ninety days prior to expiration of this permit, but no later than 180 days after commencing operation. To apply for a

AIR CONSTRUCTION PERMIT

SECTION II. FACILITY-WIDE SPECIFIC CONDITIONS

Title V operation permit, the applicant shall submit the appropriate application form, compliance test results, and such additional information as the Department may by law require. The application shall be submitted to the Department's South District office. [Rules 62-4.030, 62-4.050, 62-4.220, and Chapter 62-213, F.A.C.]

OPERATIONAL REQUIREMENTS

9. Plant Operation - Problems: If temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by hazard of fire, wind or by other cause, the permittee shall immediately notify the Department's South District office. The notification shall include pertinent information as to the cause of the problem, and what steps are being taken to correct the problem and to prevent its recurrence, and where applicable, the owner's intent toward reconstruction of destroyed facilities. Such notification does not release the permittee from any liability for failure to comply with Department rules. [Rule 62-4.130, F.A.C.]
10. Circumvention: No person shall circumvent any air pollution control device or allow the emission of air pollutants without the applicable air pollution control device operating properly. [Rule 62-210.650, F.A.C.]
11. Excess Emissions: This permit does not change any authorization for excess emissions provided by other Department permits for other emissions units. The following excess emissions provisions of state rule apply to this emissions unit (emissions unit 019) as specified below.
 - (a) Excess emissions resulting from start-up and shutdown are permitted for emissions unit 019 providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized, but in no case exceed two hours in any 24 hour period.
 - (b) Excess emissions resulting from malfunction of this emissions unit shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized, but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration.
 - (c) Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during start-up, shutdown, or malfunction shall be prohibited.

[Rules 62-210.700(1), (4) and (5), F.A.C.]

COMPLIANCE MONITORING AND TESTING REQUIREMENTS

12. Determination of Process Variables: [Rule 62-297.310(5), F.A.C.]
 - (a) Required Equipment. The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.
 - (b) Accuracy of Equipment. Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank

AIR CONSTRUCTION PERMIT
SECTION II. FACILITY-WIDE SPECIFIC CONDITIONS

scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.

REPORTING AND RECORD KEEPING REQUIREMENTS

13. Duration of Record Keeping: Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least five years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule. [Rules 62-4.160(14)(a)&(b) and 62-213.440(1)(b)2.b., F.A.C.]
14. Excess Emissions Report: In case of excess emissions resulting from malfunction, the owner or operator shall notify the Department's South District office within one working day of: the nature, extent, and duration of the excess emissions; the cause of the excess emissions; and the actions taken to correct the problem. In addition, the Department may request a written summary report of the incident. A full written report on the malfunctions shall be submitted in a quarterly report if requested by the Department. [Rules 62-4.130 and 62-210.700(6), F.A.C.]
15. Annual Operating Report for Air Pollutant Emitting Facility: The Annual Operating Report for Air Pollutant Emitting Facility shall be completed each year and shall be submitted to the Department's South District office and, if applicable, the appropriate local program by March 1 of the following year. [Rule 62-210.370(3), F.A.C.]

AIR CONSTRUCTION PERMIT
SECTION III. EMISSIONS UNITS SPECIFIC CONDITIONS

The following specific conditions apply to the following emissions units after construction.

EMISSIONS UNIT NO.	EMISSIONS UNIT DESCRIPTION
019	Backup Peel Dryer No. 2

[Note: This emissions unit is subject to the requirements of the state rules as indicated in this permit. This permit does not change the particulate emission limit of Rule 62-296.320(4)(a), F.A.C., (process weight table) or annual compliance testing frequency established by previous permits. This permit limits the input of pressed (wet) peel in order to limit potential emissions of PM/PM₁₀ to 32.05 pounds per hour and 96.15 tons per year. All PM is assumed to be PM₁₀.]

OPERATIONAL REQUIREMENTS

1. Hours of Operation: This emissions unit and existing Peel Dryer No. 1 (Emissions Unit I.D. No. – 003) shall operate no more than 6,000 total hours during any consecutive 12 month period. This emissions unit shall operate only when existing Peel Dryer No. 1 (Emissions Unit I.D. No. –003) is shutdown. [Rules 62-4.070(3), 62-210.200 and 62-212.400, F.A.C., limitation on potential to emit and assumptions relied upon for net emissions increase calculations]
2. Operation Limited: The rate of pressed peel input to the dryer shall not exceed 47 tons per hour, including the weight of moisture in the pressed peel, on a daily average basis. [Rules 62-4.070(3) and 62-212.400, F.A.C., limitation on potential to emit and assumptions relied upon for net emissions increase calculations]

EMISSION LIMITING STANDARDS

3. General Visible Emissions Standard: Except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, no person shall cause, let, permit, suffer, or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20% opacity). The test method for visible emissions shall be EPA Method 9, incorporated and adopted by reference in Chapter 62-297, F.A.C. Test procedures shall meet all applicable requirements of Chapter 62-297, F.A.C. [Rule 62-296.320(4)(b)1, F.A.C.]

REPORTING AND RECORD KEEPING REQUIREMENTS

4. Records of Operating Hours Required: The owner or operator shall make and maintain records of hours of operation of this emissions unit in units of hours per month and hours per consecutive 12 month period, to demonstrate compliance with the limit of condition 1 of this section. Records shall be made from daily operation records and shall be completed no later than the 10th day of each following month. [Rule 62-4.070(3), F.A.C., required to monitor compliance with the limitation on potential to emit]
5. Records of Input Rate Required: The owner or operator shall make and maintain records of the average rate of pressed peel input to the dryer, to demonstrate compliance with the requirements of condition 2 of this section. Records shall be made each day by dividing that day's total input rate of peel by that day's hours of operation of the dryer. [Rule 62-4.070(3), F.A.C., required to monitor compliance with the limitation on potential to emit]

AIR CONSTRUCTION PERMIT

SECTION III. EMISSIONS UNITS SPECIFIC CONDITIONS

6. Records of Operation of Dryer Bypass Stack Required: The owner or operator shall make records of the number of hours each day that the dryer is operated with emissions directed in total or in part through the bypass stack. The number of hours of bypass stack operation recorded each calendar quarter shall be reported to the Department's South District office no later than the 10th day following each calendar quarter. [Rule 62-4.070(3), F.A.C.]

[Note: Excess emissions are limited by Rule 62-210.700, F.A.C., and previous Department permits. Those limitations are not changed by this permit.]

TECHNICAL EVALUATION AND DETERMINATION

1 APPLICANT NAME AND ADDRESS

Southern Gardens Citrus Processing Corporation
Post Office Box 130
Clewiston, Florida 33440

Authorized Representative: Tristan Chapman, Vice President and General Manager

2 FACILITY DESCRIPTION, PROJECT DETAILS AND RULE APPLICABILITY

The facility is an existing citrus juice processing facility. The facility currently has a total of thirty-nine citrus juice extractors, one citrus feed mill, two pellet mills with three pellet coolers, four steam boilers, and seven volatile organic liquid storage tanks. The facility is limited to a total fruit processing capacity of 20 million boxes of fruit per year by permit PSD-FL-299.

The existing citrus feed mill consists of one 60,000 pounds per hour, water evaporation rate, peel dryer and one 135,000 pounds per hour, water evaporation rate, waste heat evaporator. The maximum input rate through the citrus feed mill is 47 tons per hour, including the weight of moisture in the pressed peel, on a daily average basis. The mill is fired with No. 6 fuel oil having a maximum sulfur content of 1.5 percent, by weight, and a maximum heat input of 84.0 MMBtu per hour. The peel dryer is permitted to operate up to 6,000 hours per year and emissions are controlled by a wet scrubber.

The applicant 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 with the identical capacities discussed above. The proposed peel dryer will be connected to the existing waste heat evaporator and will operate solely as a backup to the existing peel dryer. Due to the physical limitations associated with the existing waste heat evaporator, both dryers cannot be operated simultaneously. The proposed peel dryer will be vented through the existing waste heat evaporator and stack, which is controlled by a wet scrubber. The applicant did not seek any relaxation in currently enforceable conditions in its other existing emissions units.

The emissions unit addressed by this permit is Backup Peel Dryer No. 2, new emissions unit I.D. -019.

The emissions increases associated with this project were estimated as follows in tons per year. No offsetting emissions were assumed in this estimate.

Pollutant	Net Increase ¹	PSD Significance	Subject to PSD?
PM/ PM ₁₀	0	25/15	No
SO ₂	0	40	No
NO _x	0	40	No
CO	0	100	No
VOC	0	40	No

¹ Since there will be no increase in the current permitted plant processing capacity of 20 million boxes of fruit per year and no increase in the heat input to the dryers, then there will be no net emissions increase as a result of adding a backup peel dryer, when operated as described by the permit application.

The proposed project is subject to preconstruction review requirements under the provisions of Chapter 403, F.S., and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297, F.A.C. The existing facility is located in an area designated, in accordance with Rule 62-204.340, F.A.C., as attainment or unclassifiable for the criteria pollutants ozone, PM₁₀, carbon monoxide, SO₂, nitrogen dioxide and lead. This facility is classified as a Major or Title V Source of air pollution because emissions of at least one regulated air pollutant exceeds 100 tons per year (TPY). The Department has previously found that citrus juice processing facilities such as this facility have potential emissions of VOC exceeding 250 TPY.

This facility is not within an industry included in the list of the 28 Major Facility Categories per Table 212.400-1 of Chapter 62-212, F.A.C. Because emissions are greater than 250 TPY for at least one criteria pollutant (VOC), the facility is also an existing Major Facility with respect to Rule 62-212.400, F.A.C. Prevention of Significant Deterioration (PSD). The net increase in emissions of PM/PM₁₀, NO_x, SO₂, CO and VOC do not exceed the PSD significance levels of Table 212.400-2 of Chapter 62-212, F.A.C. Therefore the project is not subject to PSD requirements of Rule 62-212.400, F.A.C., for these pollutants.

The applicant stated that this facility is a major source of hazardous air pollutants (HAPs). This project is not subject to a case-by-case MACT determination, per Rule 62-204.800(10)(d)2, F.A.C., because it does not result in the construction or reconstruction of a major source of HAP emissions. This project is not subject to any requirements under the National Emissions Standards for Hazardous Air Pollutants, 40 CFR 61 or 63.

3 SOURCE IMPACT ANALYSIS

An impact analysis was not required for this project because it is not subject to the requirements of PSD.

4 EXCESS EMISSIONS

Excess emissions for this emissions unit are specified in Section II of the permit. This permitting action does not change any authorization for excess emissions provided by other Department permits for other emissions units

5 LIMITS AND COMPLIANCE REQUIREMENTS

The permit limits the operation of the proposed peel dryer. Specific emission limits were not imposed because the potential emissions are well below the PSD significance criteria. The operational limits and the compliance requirements are detailed in Section III of the permit.

6 PRELIMINARY DETERMINATION

Based on the foregoing technical evaluation of the application and additional information submitted by the applicant and other available information, the Department has made a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations. The Department's preliminary determination is to issue the draft permit to allow the construction of Backup No. 2 Peel Dryer, subject to the terms and conditions of the draft permit.

7 FINAL DETERMINATION

^DRAFT (This section will be revised when a final permit is issued for this project.)

DETAILS OF THIS ANALYSIS MAY BE OBTAINED BY CONTACTING:

Edward J. Svec, Engineer IV
Department of Environmental Protection
Bureau of Air Regulation
Mail Station #5505
2600 Blair Stone Road
Tallahassee, Florida 32399-2400
Telephone: 850/488-0114

APPENDIX GC
GENERAL PERMIT CONDITIONS [RULE 62-4.160, F.A.C.]

- G.1 The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
- G.2 This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings or exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
- G.3 As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey and vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
- G.4 This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
- G.5 This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
- G.6 The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
- G.7 The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:
- (a) Have access to and copy and records that must be kept under the conditions of the permit;
 - (b) Inspect the facility, equipment, practices, or operations regulated or required under this permit, and,
 - (c) Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.
- Reasonable time may depend on the nature of the concern being investigated.
- G.8 If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:
- (a) A description of and cause of non-compliance; and
 - (b) The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

APPENDIX GC
GENERAL PERMIT CONDITIONS [RULE 62-4.160, F.A.C.]

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

- G.9 In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.
- G.10 The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.
- G.11 This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.
- G.12 This permit or a copy thereof shall be kept at the work site of the permitted activity.
- G.13 This permit also constitutes:
- (a) Determination of Best Available Control Technology (X);
 - (b) Determination of Prevention of Significant Deterioration (); and
 - (c) Compliance with New Source Performance Standards ().
- G.14 The permittee shall comply with the following:
- (a) Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
 - (b) The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application or this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
 - (c) Records of monitoring information shall include:
 - 1. The date, exact place, and time of sampling or measurements;
 - 2. The person responsible for performing the sampling or measurements;
 - 3. The dates analyses were performed;
 - 4. The person responsible for performing the analyses;
 - 5. The analytical techniques or methods used; and
 - 6. The results of such analyses.
- G.15 When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.



Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

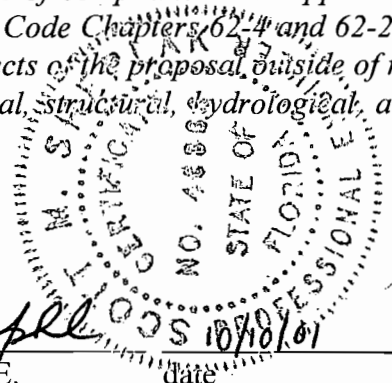
P.E. Certification Statement

Permittee:
Southern Gardens Citrus Processing Corp.

Permit No.: 0510015-008-AC

Project type: Air Construction Permit – Backup Peel Dryer No. 2

I HEREBY CERTIFY that the engineering features described in the above referenced application and subject to the proposed permit conditions provide reasonable assurance of compliance with applicable provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 62-4 and 62-204 through 62-297. However, I have not evaluated and I do not certify aspects of the proposal outside of my area of expertise (including but not limited to the electrical, mechanical, structural, hydrological, and geological features).


Scott M. Sheplak

Scott M. Sheplak, P.E. date


Registration Number: 48866


Permitting Authority:
Department of Environmental Protection
Bureau of Air Regulation
111 South Magnolia Drive, Suite 4
Tallahassee, Florida 32301
Telephone: 850/921-9532
Fax: 850/922-6979

Memorandum

Florida Department of Environmental Protection

TO: Clair Fancy

THRU: Scott Sheplak 

FROM: Edward Svec 

DATE: October 5, 2001

SUBJECT: Southern Gardens Citrus Processing Corporation
Backup Peel Dryer No. 2
0510015-008-AC

Attached for approval and signature is an intent to issue an air construction permit for the installation of 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 with the identical capacities of the existing peel dryer. The proposed peel dryer will be connected to the existing waste heat evaporator and will operate solely as a backup to the existing peel dryer. Due to the physical limitations associated with the existing waste heat evaporator, both dryers cannot be operated simultaneously. The proposed peel dryer will be vented through the existing waste heat evaporator and stack, which is controlled by a wet scrubber referenced above. The applicant did not seek any relaxation in currently enforceable conditions in its other existing emissions units. There will be no emission increases due to this project.

The applicant did not seek any relaxation in currently enforceable conditions in its other existing emissions units.

This project is not subject to PSD because the associated emissions increases are not significant for PSD. There will be no actual emission increases due to this project.

October 5, 2001 is day 10 of the 90 day timeclock.

Attachments

/es

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.

A handwritten signature in cursive script that reads '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

RECEIVED

SEP 25 2001

BUREAU OF AIR REGULATION

**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**

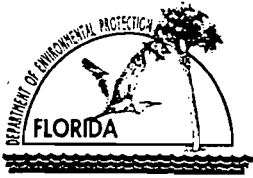
DISTRIBUTION:

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

RECEIVED

SEP 25 2001

BUREAU OF AIR REGULATION



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: _____

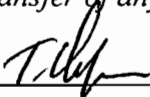
Reason for revision: _____

Air Construction Permit Application

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

- 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>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.</i>  _____ 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.



Signature

David A. Buff

Date

9/24/01

* 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: \$: _____ 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

[Empty box for Application Comment]

Facility Regulatory Classifications

Check all that apply:

1. <input type="checkbox"/> Small Business Stationary Source?	<input type="checkbox"/> Unknown
2. <input checked="" type="checkbox"/> Major Source of Pollutants Other than Hazardous Air Pollutants (HAPs)?	
3. <input type="checkbox"/> Synthetic Minor Source of Pollutants Other than HAPs?	
4. <input checked="" type="checkbox"/> Major Source of Hazardous Air Pollutants (HAPs)?	
5. <input type="checkbox"/> Synthetic Minor Source of HAPs?	
6. <input checked="" type="checkbox"/> One or More Emissions Units Subject to NSPS?	
7. <input type="checkbox"/> One or More Emission Units Subject to NESHAP?	
8. <input type="checkbox"/> Title V Source by EPA Designation?	
9. Facility Regulatory Classifications Comment (limit to 200 characters): <p style="text-align: center;">HAPs classification is based on limited test data.</p>	

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

Title V Core List

Effective:03/25/97

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.

Title V Core List

Effective:03/25/97

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

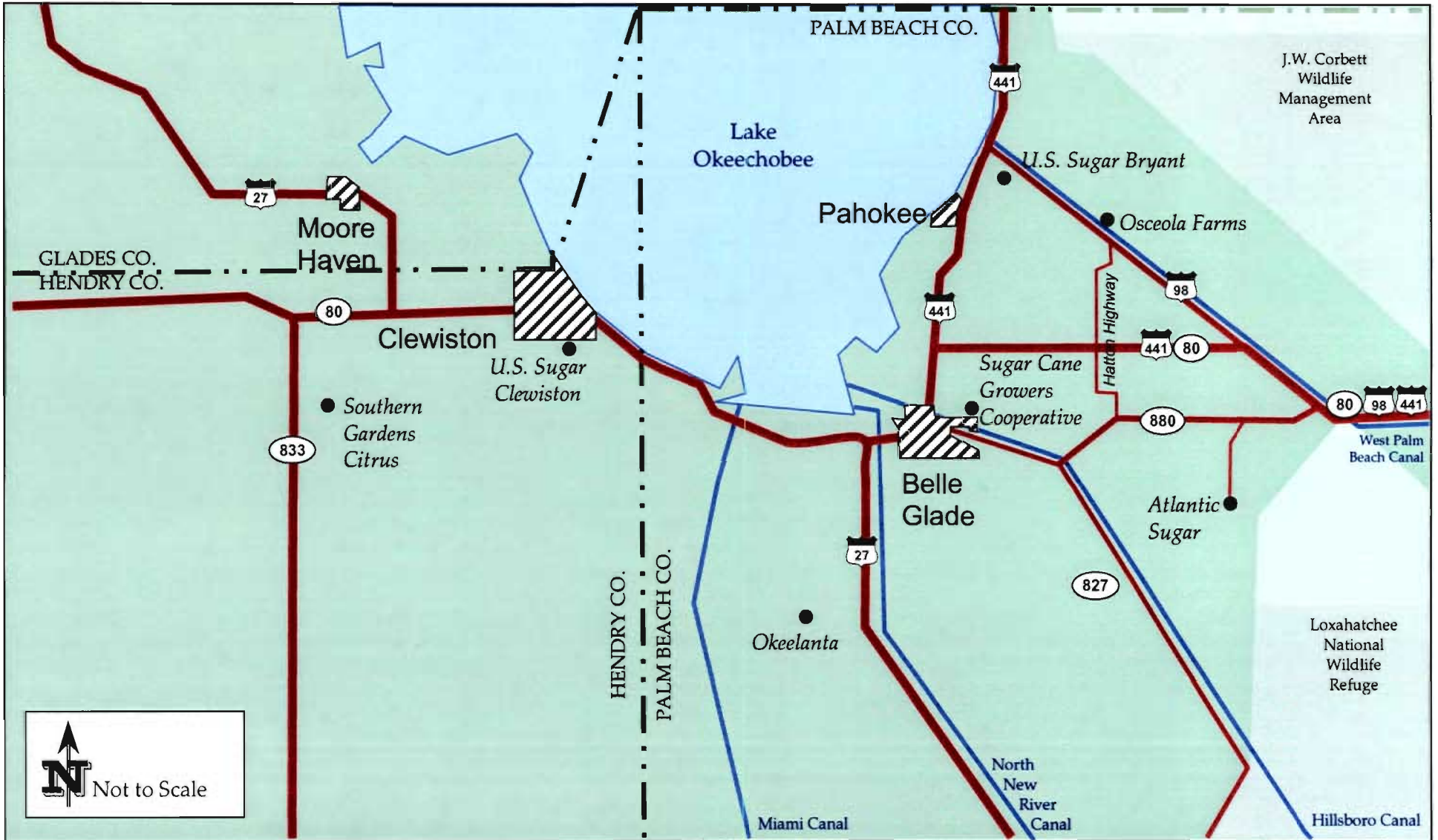
List of Pollutants Emitted

1. Pollutant Emitted	2. Pollutant Classif.	3. Requested Emissions Cap		4. Basis for Emissions Cap	5. Pollutant Comment
		lb/hour	tons/year		
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

Additional Supplemental Requirements for Title V Air Operation Permit Applications

8. List of Proposed Insignificant Activities: <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
9. List of Equipment/Activities Regulated under Title VI: <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Equipment/Activities On site but Not Required to be Individually Listed <input type="checkbox"/> Not Applicable
10. Alternative Methods of Operation: <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
11. Alternative Modes of Operation (Emissions Trading): <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
12. Identification of Additional Applicable Requirements: <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
13. Risk Management Plan Verification: <input type="checkbox"/> 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: _____) <input type="checkbox"/> Plan to be submitted to CEPPO (Date required: _____) <input type="checkbox"/> Not Applicable
14. Compliance Report and Plan: <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
15. Compliance Certification (Hard-copy Required): <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable

ATTACHMENT SG-FE-1
AREA MAP



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

Source: Golder Associates Inc., 2001



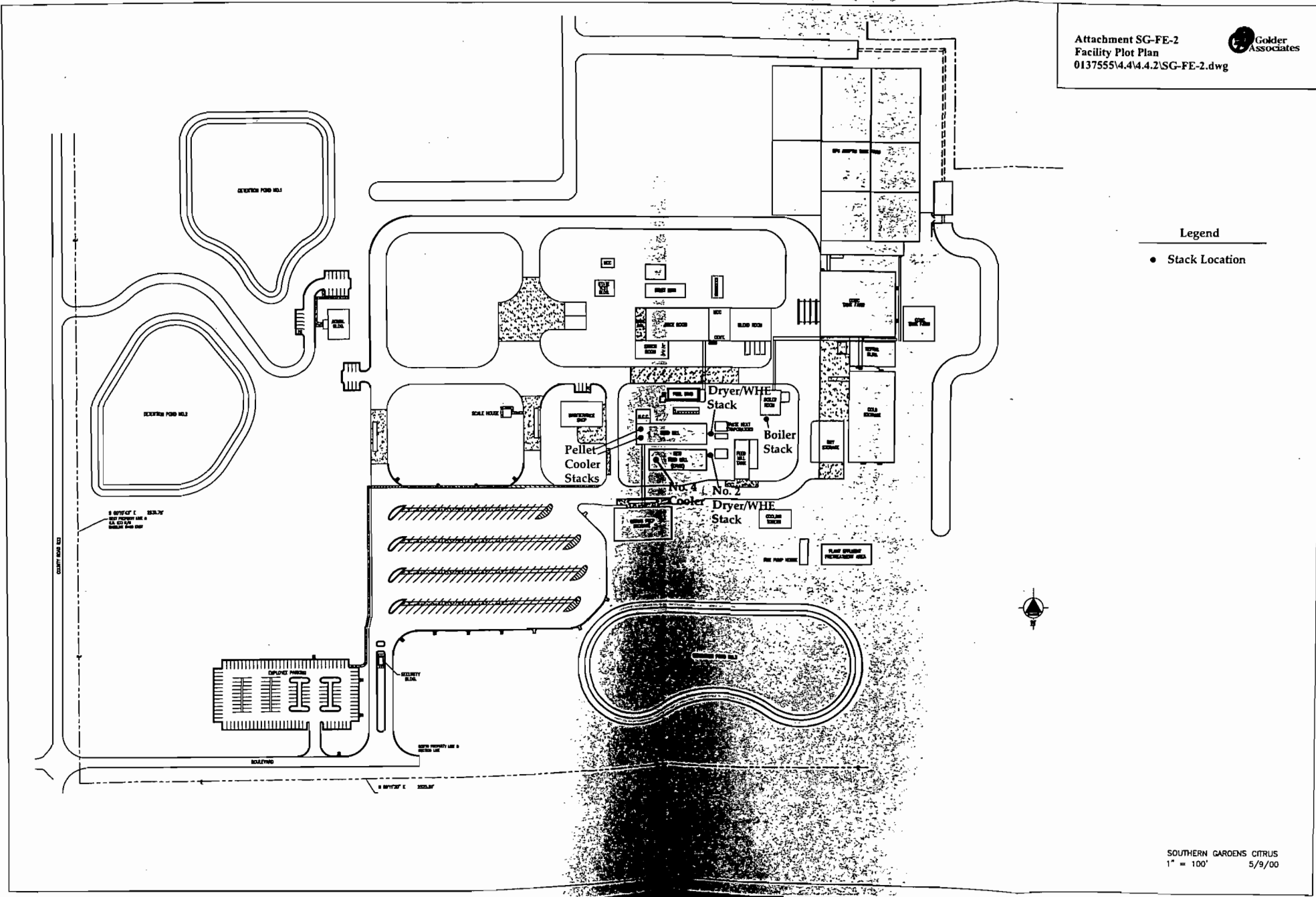
ATTACHMENT SG-FE-2
FACILITY PLOT PLAN

Attachment SG-FE-2
Facility Plot Plan
01375554.4\4.4.2\SG-FE-2.dwg

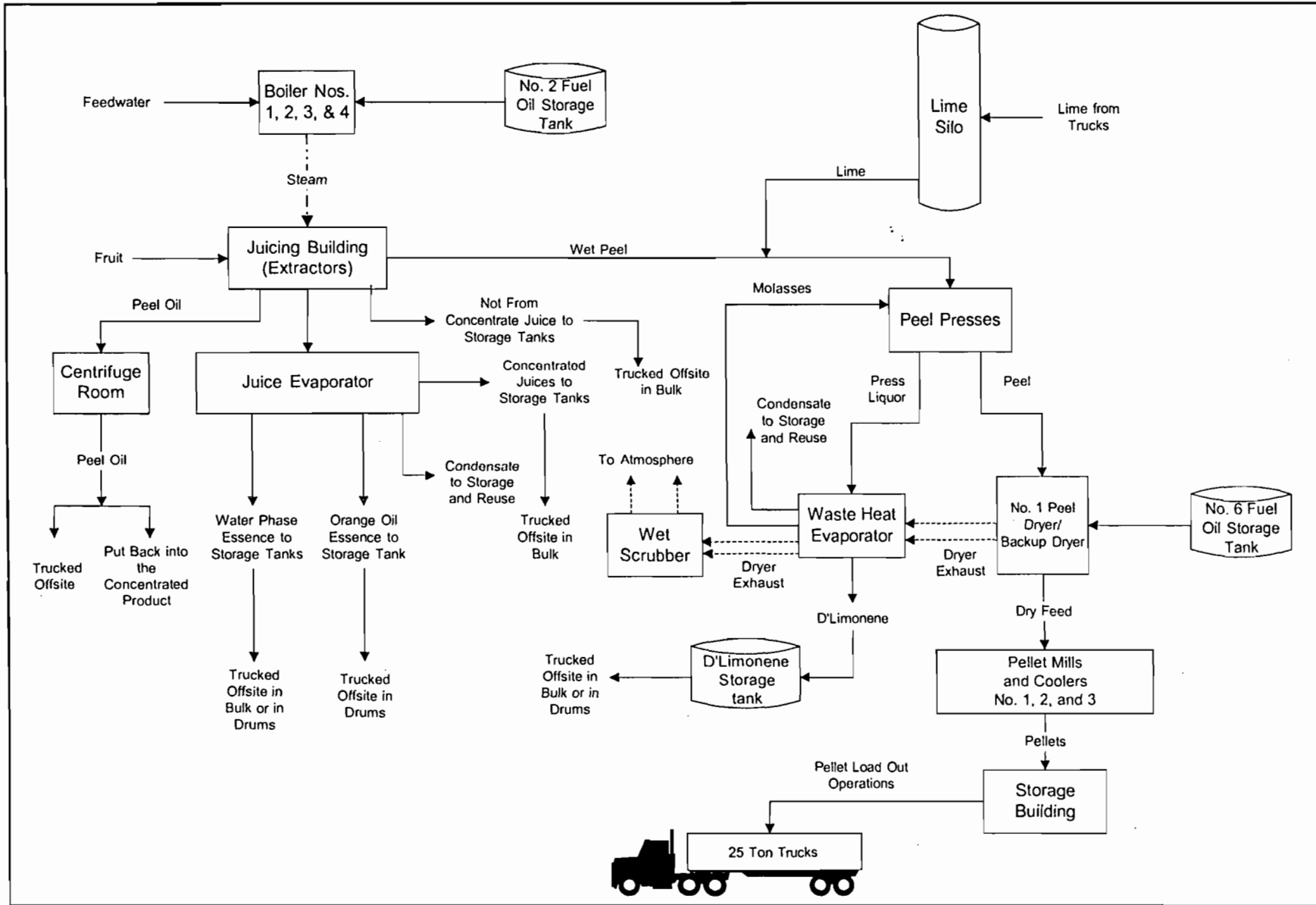


Legend

- Stack Location



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 - - - - ->



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)			
<input checked="" type="checkbox"/> 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).			
<input type="checkbox"/> 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.			
<input type="checkbox"/> 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)			
<input checked="" type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.			
<input type="checkbox"/> 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:		<input checked="" type="checkbox"/> No ID	
ID:		<input type="checkbox"/> ID Unknown	
5. Emissions Unit Status Code: C	6. Initial Startup Date:	7. Emissions Unit Major Group SIC Code: 20	8. Acid Rain Unit? <input type="checkbox"/>
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):	
<p>Backup peel dryer will only operate when the existing peel dryer is shutdown. BDP = Bone dry peel</p> <ol style="list-style-type: none"> 1. Max Prod. Rate represents dried citrus peel at 0% moisture. 2. Process or throughput varies depending upon moisture content of peel. <p>See Attachment SG-EU1-B6.</p>	

**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? <input checked="" type="checkbox"/>
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: PM₁₀		2. Total Percent Efficiency of Control:	
3. Potential Emissions: 32.05 lb/hour		4. Synthetically Limited? [<input checked="" type="checkbox"/>] 96.2 tons/year	
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: SO₂		2. Total Percent Efficiency of Control:	
3. Potential Emissions: 42 lb/hour 126 tons/year		4. Synthetically Limited? [<input checked="" type="checkbox"/>]	
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? <input checked="" type="checkbox"/>	
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? <input checked="" type="checkbox"/> [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: <input checked="" type="checkbox"/> Rule <input type="checkbox"/> 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:	<input type="checkbox"/> Rule <input checked="" type="checkbox"/> 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 <input checked="" type="checkbox"/> Attached, Document ID: <u>SG-EU1-J1</u> <input type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
2. Fuel Analysis or Specification <input checked="" type="checkbox"/> Attached, Document ID: <u>SG-EU1-J2</u> <input type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
3. Detailed Description of Control Equipment <input checked="" type="checkbox"/> Attached, Document ID: <u>SG-EU1-J3</u> <input type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
4. Description of Stack Sampling Facilities <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
5. Compliance Test Report <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously submitted, Date: _____ <input checked="" type="checkbox"/> Not Applicable
6. Procedures for Startup and Shutdown <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
7. Operation and Maintenance Plan <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
8. Supplemental Information for Construction Permit Application <input checked="" type="checkbox"/> Attached, Document ID: <u>Attachment A</u> <input type="checkbox"/> Not Applicable
9. Other Information Required by Rule or Statute <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
10. Supplemental Requirements Comment:

Additional Supplemental Requirements for Title V Air Operation Permit Applications

11. Alternative Methods of Operation <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
12. Alternative Modes of Operation (Emissions Trading) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
13. Identification of Additional Applicable Requirements <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
14. Compliance Assurance Monitoring Plan <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
15. Acid Rain Part Application (Hard-copy Required) <input type="checkbox"/> Acid Rain Part - Phase II (Form No. 62-210.900(1)(a)) Attached, Document ID: _____ <input type="checkbox"/> Repowering Extension Plan (Form No. 62-210.900(1)(a)1.) Attached, Document ID: _____ <input type="checkbox"/> New Unit Exemption (Form No. 62-210.900(1)(a)2.) Attached, Document ID: _____ <input type="checkbox"/> Retired Unit Exemption (Form No. 62-210.900(1)(a)3.) Attached, Document ID: _____ <input type="checkbox"/> Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.) Attached, Document ID: _____ <input type="checkbox"/> Phase NOx Averaging Plan (Form No. 62-210.900(1)(a)5.) Attached, Document ID: _____ <input type="checkbox"/> 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.

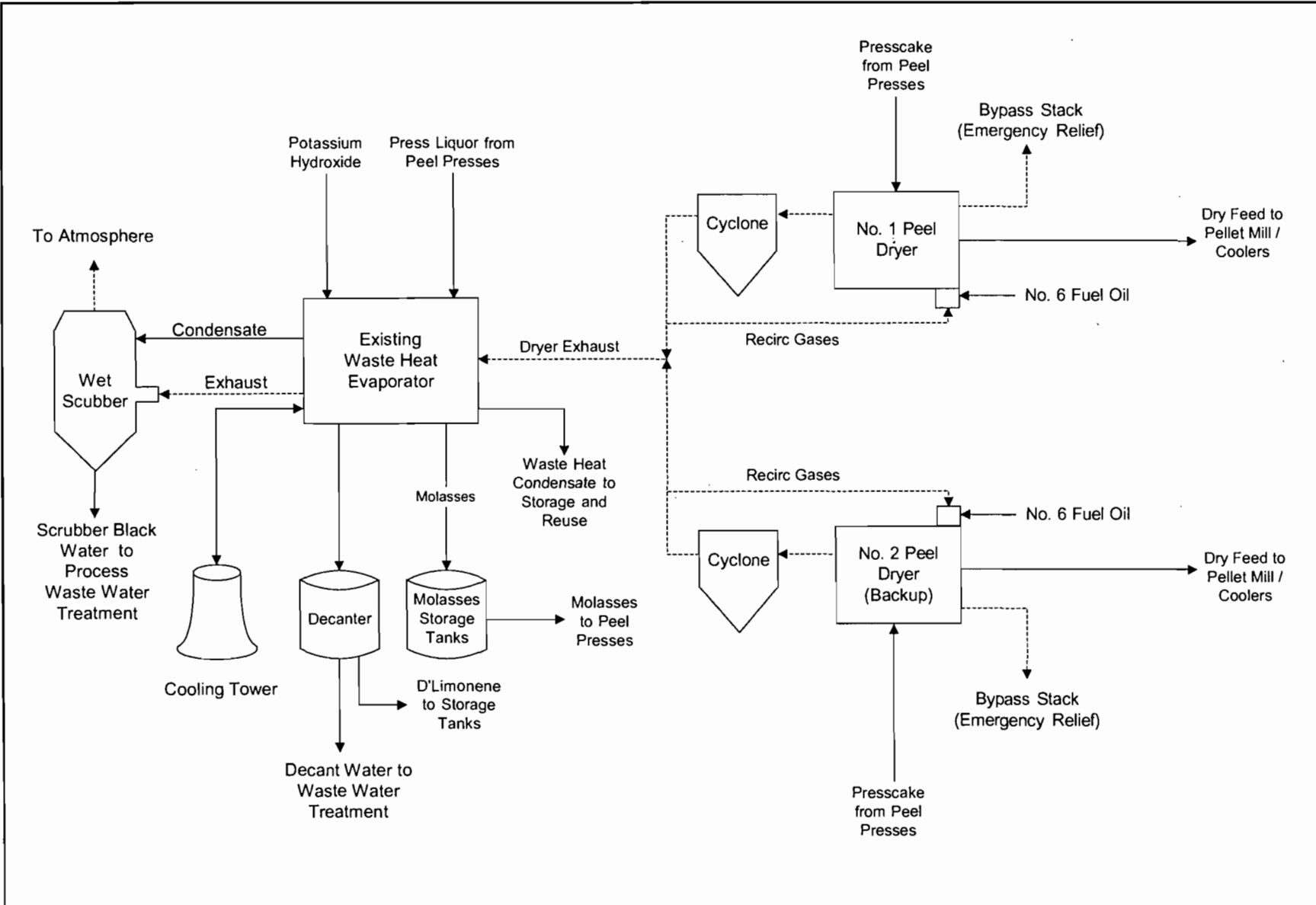
^b Based on 84 MMBtu/hr and 6,000 hours per year or 20 million boxes per year and 9.0 lb BDP/box.

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 ·····



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

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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 SGPC 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 SGPC 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). SGPC 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

SGPC 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 SGPCPC during the most recent crop season was the highest of any season since SGPCPC 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 SGPCPC'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.

Florida Department of
Environmental Protection

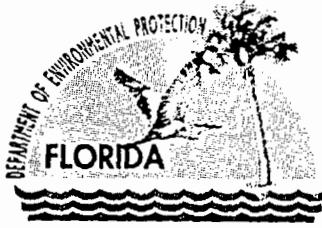
Memorandum

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"

Mr. Tristan Chapman
August 8, 2001
Page Two

- 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

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT OF RETURN ADDRESS

SENDER	ACTION ON DELIVERY												
<ul style="list-style-type: none"> ■ 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. 	<table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%;">A. Received by (Please Print Clearly)</td> <td style="width: 50%;">B. Date of Delivery</td> </tr> <tr> <td></td> <td style="text-align: center;">8-10-01</td> </tr> <tr> <td colspan="2">C. Signature</td> </tr> <tr> <td style="text-align: center;">x <i>Andrea Salo</i></td> <td> <input type="checkbox"/> Agent <input type="checkbox"/> Addressee </td> </tr> <tr> <td colspan="2">D. Is delivery address different from item 1? <input type="checkbox"/> Yes</td> </tr> <tr> <td colspan="2">If YES, enter delivery address below: <input type="checkbox"/> No</td> </tr> </table>	A. Received by (Please Print Clearly)	B. Date of Delivery		8-10-01	C. Signature		x <i>Andrea Salo</i>	<input type="checkbox"/> Agent <input type="checkbox"/> Addressee	D. Is delivery address different from item 1? <input type="checkbox"/> Yes		If YES, enter delivery address below: <input type="checkbox"/> No	
A. Received by (Please Print Clearly)	B. Date of Delivery												
	8-10-01												
C. Signature													
x <i>Andrea Salo</i>	<input type="checkbox"/> Agent <input type="checkbox"/> Addressee												
D. Is delivery address different from item 1? <input type="checkbox"/> Yes													
If YES, enter delivery address below: <input type="checkbox"/> No													
1. Article Addressed to: MR TRISTAN CHAPMAN VICE PRESIDENT & GEN MANAGER SOUTHERN GARDENS CITRUS PROC. CORP. POST OFFICE BOX 130 CLEWISTON FLORIDA 33440	3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.												
2. Article Number (Copy from service label) 7099 3400 0000 1451 2759													
4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes													

Golder Associates Inc.

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



RECEIVED
JUL - 9 2001
Bureau of Air Monitoring
& Mobile Sources

0137555

July 6, 2001

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

Attention: Mr. Joe Kahn, P.E.

SUBJECT: RELOCATED PEEL DRYER AND NEW PELLET MILL/COOLER
SOUTHERN GARDENS CITRUS PROCESSING CORPORATION

Dear Mr. Kahn:

On behalf of Southern Gardens Citrus Processing Corporation, please find enclosed four (4) copies of an air construction permit application to relocate an existing citrus peel dryer/waste heat evaporator to the existing Southern Gardens citrus processing facility located near Clewiston, Florida. The application also includes a new pellet mill and cooler to support the additional peel dryer and raising the facility production cap to 22.5 million boxes per year of fruit. Although the application is being submitted under the citrus industry legislation, the project is designed to not trigger prevention of significant deterioration (PSD) new source review requirements.

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, P. E., Q. E. P.
Principal Engineer

DB/jkw

cc: S. Watson
O. Rodriguez
D. Pridgen
W. Wehrum

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**AIR CONSTRUCTION PERMIT APPLICATION
FOR PEEL DRYER/WASTE HEAT EVAPORATOR
AND PELLET COOLER ADDITION**

**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**

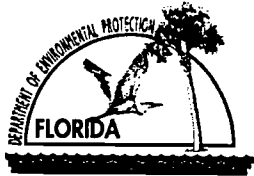
Prepared By:

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

**July 2001
0137555**

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**4 Copies - FDEP Tallahassee
1 Copy - FDEP Ft. Myers
2 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 [<input checked="" type="checkbox"/>] No	6. Existing Permitted Facility? [<input checked="" type="checkbox"/>] 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:	<i>7-9-01</i>
2. Permit Number:	<i>0510015-008-AC</i>
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: _____

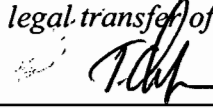
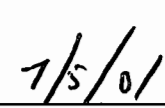
Reason for revision: _____

Air Construction Permit Application

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

-] 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>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.</i>  _____ Signature  _____ 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 [], 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. Beff

Signature

7/6/01

Date

*Attach any exception to certification statement.

Construction/Modification Information

1. Description of Proposed Project or Alterations:

This application is for the addition of a peel dryer/waste heat evaporator and a pellet mill and cooler. The peel dryer/waste heat evaporator is existing equipment being moved from another citrus plant.

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

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

Application Comment

[Empty box for Application Comment]

Facility Regulatory Classifications

Check all that apply:

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

List of Applicable Regulations

All Federal regulatory citations reflect the rule language as of June 2000.	
All State regulatory citations reflect the rule language as of June 2000.	
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

Title V Core List

Effective:03/25/97

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.

Title V Core List

Effective:03/25/97

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		4. Basis for Emissions Cap	5. Pollutant Comment
		lb/hour	tons/year		
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

Additional Supplemental Requirements for Title V Air Operation Permit Applications

8. List of Proposed Insignificant Activities: <input type="checkbox"/> Attached, Document ID:_____ <input type="checkbox"/> Not Applicable
9. List of Equipment/Activities Regulated under Title VI: <input type="checkbox"/> Attached, Document ID:_____ <input type="checkbox"/> Equipment/Activities On site but Not Required to be Individually Listed <input type="checkbox"/> Not Applicable
10. Alternative Methods of Operation: <input type="checkbox"/> Attached, Document ID:_____ <input type="checkbox"/> Not Applicable
11. Alternative Modes of Operation (Emissions Trading): <input type="checkbox"/> Attached, Document ID:_____ <input type="checkbox"/> Not Applicable
12. Identification of Additional Applicable Requirements: <input type="checkbox"/> Attached, Document ID:_____ <input type="checkbox"/> Not Applicable
13. Risk Management Plan Verification: <input type="checkbox"/> 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:_____) <input type="checkbox"/> Plan to be submitted to CEPPO (Date required:_____) <input type="checkbox"/> Not Applicable
14. Compliance Report and Plan: <input type="checkbox"/> Attached, Document ID:_____ <input type="checkbox"/> Not Applicable
15. Compliance Certification (Hard-copy Required): <input type="checkbox"/> Attached, Document ID:_____ <input type="checkbox"/> Not Applicable

ATTACHMENT SG-FE-1
AREA MAP



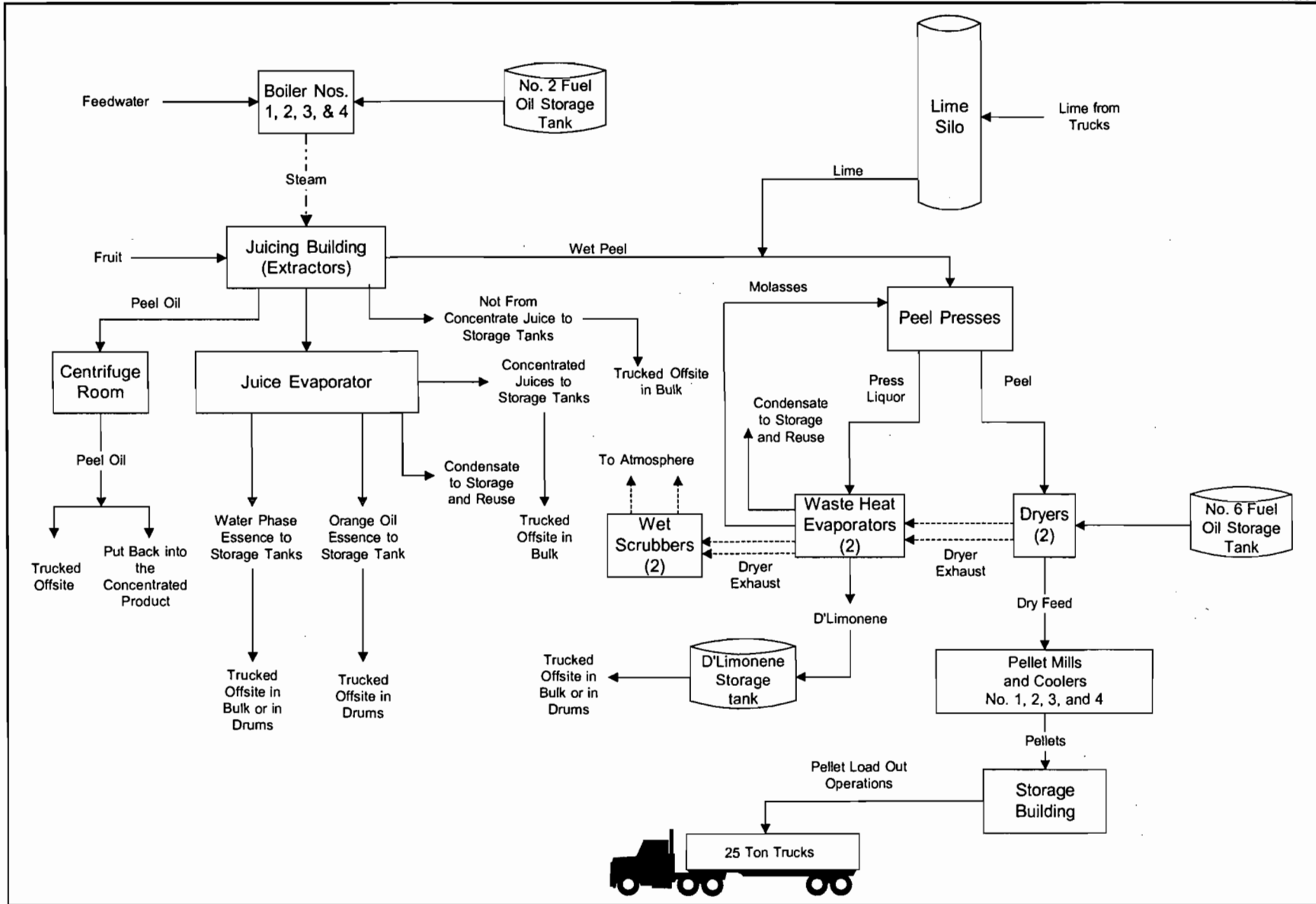
Attachment SG-FE-1
 Location of Southern Gardens Citrus Processing Corporation

Source: Golder Associates Inc., 2001



**ATTACHMENT SG-FE-2
FACILITY PLOT PLAN**

**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: 7/6/01

Process Flow Legend:
 Solid / Liquid —————>
 Gas - - - - ->
 Steam - - - - ->



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

<p>1. Type of Emissions Unit Addressed in This Section: (Check one)</p> <p><input checked="" type="checkbox"/> 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).</p> <p><input type="checkbox"/> 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.</p> <p><input type="checkbox"/> 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.</p>			
<p>2. Regulated or Unregulated Emissions Unit? (Check one)</p> <p><input checked="" type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.</p> <p><input type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.</p>			
<p>3. Description of Emissions Unit Addressed in This Section (limit to 60 characters): No. 2 Peel Dryer and Waste Heat Evaporator</p>			
<p>4. Emissions Unit Identification Number: ID:</p>			<p><input checked="" type="checkbox"/> No ID <input type="checkbox"/> ID Unknown</p>
<p>5. Emissions Unit Status Code: C</p>	<p>6. Initial Startup Date:</p>	<p>7. Emissions Unit Major Group SIC Code: 20</p>	<p>8. Acid Rain Unit? <input type="checkbox"/></p>
<p>9. Emissions Unit Comment: (Limit to 500 Characters)</p> <p>4-Digit SIC code = 2037. The emission unit consists of a 135,000 lb/hr waste heat evaporator and a 60,000 lb/hr water evaporation dryer fired with fuel oil containing a maximum sulfur content of 1.5 percent by weight.</p>			

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):	
<p>BDP = Bone dry peel</p> <p>1. Max Prod. Rate represents dried citrus peel at 0% moisture.</p> <p>2. Process or throughput varies depending upon moisture content of peel.</p> <p>See Attachment SG-EU1-B6.</p>	

**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
FLL 403.08725(1) Compliance Requirements
FLL 403.08725(2)(c) Permitted Emission Limits
FLL 403.08725(2)(d) Permitted Emission Limits
FLL 403.08725(2)(e)1. Permitted Emission Limits
FLL 403.08725(2)(f)1. Permitted Emission Limits
FLL 403.08725(2)(g)1. Permitted Emission Limits
FLL 403.08725(3)(a) Emissions Determination and Reporting
FLL 403.08725(3)(b) Emissions Determination and Reporting
FLL 403.08725(3)(d) Emissions Determination and Reporting
FLL 403.08725(3)(h) Emissions Determination and Reporting
FLL 403.08725(3)(i)1. Emissions Determination and Reporting
FLL 403.08725(3)(i)2. Emissions Determination and Reporting
FLL 403.08725(3)(i)3. Emissions Determination and Reporting
FLL 403.08725(3)(j) Emissions Determination and Reporting
FLL 403.08725(3)(k) Emissions Determination and Reporting
FLL 403.08725(4)(a)1. Emissions Trading

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? CFM2		2. Emission Point Type Code: 1	
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:			
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):			

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: 92,250	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		EL
SO ₂			EL
NO _x			EL
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? <input checked="" type="checkbox"/>	
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; E = 32.05 lb/hr			
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:		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: PM₁₀		2. Total Percent Efficiency of Control:	
3. Potential Emissions: 15 lb/hour		4. Synthetically Limited? [<input checked="" type="checkbox"/>]	
		45 tons/year	
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 _____ to _____ tons/year			
6. Emission Factor: 15 lb/hr Reference: FLL 403.08725(2)(e)1.		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 1 of 1

1. Basis for Allowable Emissions Code: OTHER		2. Future Effective Date of Allowable Emissions:	
3. Requested Allowable Emissions and Units: 15 lb/hr		4. Equivalent Allowable Emissions: 15 lb/hour 45 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 PM₁₀ limit for citrus peel dryers from FLL 403.08725(2)(e)1.			

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

Potential/Fugitive Emissions

1. Pollutant Emitted: SO₂		2. Total Percent Efficiency of Control:	
3. Potential Emissions: 42 lb/hour 126 tons/year		4. Synthetically Limited? <input checked="" type="checkbox"/> [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: 0.5 lb/MMBtu		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: 28.6 lb/hour		4. Synthetically Limited? [X]	
		85.7 tons/year	
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 _____ to _____ tons/year			
6. Emission Factor: 0.34 lb/MMBtu Reference: FLL 403.08725(2)(f)1.b.		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 1 of 1

1. Basis for Allowable Emissions Code: OTHER		2. Future Effective Date of Allowable Emissions:	
3. Requested Allowable Emissions and Units: 0.34 lb/MMBtu		4. Equivalent Allowable Emissions: 28.6 lb/hour 85.7 tons/year	
5. Method of Compliance (limit to 60 characters): EPA Method 7E			
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): Based on nitrogen oxide emission for citrus peel dryers in FLL 403.08725(2)(f)1.b.			

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: 1,522.3 lb/hour		4. Synthetically Limited? [X]	
		2,906.3 tons/year	
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 _____ to _____ tons/year			
6. Emission Factor: 82.51 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: 951.4 lb/hour		4. Synthetically Limited? [<input checked="" type="checkbox"/>]	
		1,816.5 tons/year	
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 _____ to _____ tons/year			
6. Emission Factor: 51.57 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: [<input checked="" type="checkbox"/>] Rule [<input type="checkbox"/>] 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. and FLL 403.08725(2)(g)1.	

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:	[<input type="checkbox"/>] Rule [<input checked="" type="checkbox"/>] 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: <u>SG-EU1-J1</u> [] Not Applicable [] Waiver Requested
2. Fuel Analysis or Specification [X] Attached, Document ID: <u>SG-EU1-J2</u> [] Not Applicable [] Waiver Requested
3. Detailed Description of Control Equipment [X] Attached, Document ID: <u>SG-EU1-J3</u> [] 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: <u>Attachment A</u> [] 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 <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
12. Alternative Modes of Operation (Emissions Trading) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
13. Identification of Additional Applicable Requirements <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
14. Compliance Assurance Monitoring Plan <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
15. Acid Rain Part Application (Hard-copy Required) <input type="checkbox"/> Acid Rain Part - Phase II (Form No. 62-210.900(1)(a)) Attached, Document ID: _____ <input type="checkbox"/> Repowering Extension Plan (Form No. 62-210.900(1)(a)1.) Attached, Document ID: _____ <input type="checkbox"/> New Unit Exemption (Form No. 62-210.900(1)(a)2.) Attached, Document ID: _____ <input type="checkbox"/> Retired Unit Exemption (Form No. 62-210.900(1)(a)3.) Attached, Document ID: _____ <input type="checkbox"/> Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.) Attached, Document ID: _____ <input type="checkbox"/> Phase NOx Averaging Plan (Form No. 62-210.900(1)(a)5.) Attached, Document ID: _____ <input type="checkbox"/> Not Applicable

ATTACHMENT SG-EU1-B6
OPERATING CAPACITY/SCHEDULE COMMENT

ATTACHMENT SG-EU1-B6**Operating Capacity/Schedule Comment**

The 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.

**ATTACHMENT SG-EU1-G8
CALCULATION OF EMISSIONS**

Attachment SG-EU1-G8. Future Potential Emissions for New No. 2 Peel Dryer/WHE 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)	32.05 lb/hr	1	--	32.05	6,000 hr/yr	96.15
Particulate (PM ₁₀)	15 lb/hr	2	--	15	6,000 hr/yr	45.0
Sulfur dioxide	0.5 lb/MMBtu	3	84.0 MMBtu/hr	42.0	504,000 MMBtu/yr	126.0
Nitrogen oxides	0.34 lb/MMBtu	4	84.0 MMBtu/hr	28.6	504,000 MMBtu/yr	85.7
Carbon monoxide						
Early/Mids	58.05 lb/ton BDP	5	18.5 tons/hr BDP	1,071.1	--	--
Valencia	82.51 lb/ton BDP	5	18.5 tons/hr BDP	1,522.3	--	--
Annual Average	63.01 lb/ton BDP	5	--	--	92,250 tons/yr BDP	2,906.3
VOC						
Early/Mids	36.28 lb/ton BDP	6	18.5 tons/hr BDP	669.4	--	--
Valencia	51.57 lb/ton BDP	6	18.5 tons/hr BDP	951.4	--	--
Annual Average	39.38 lb/ton BDP	6	--	--	92,250 tons/yr BDP	1,816.5

Footnotes:

^a Proposed maximum heat input rate and throughput rate.

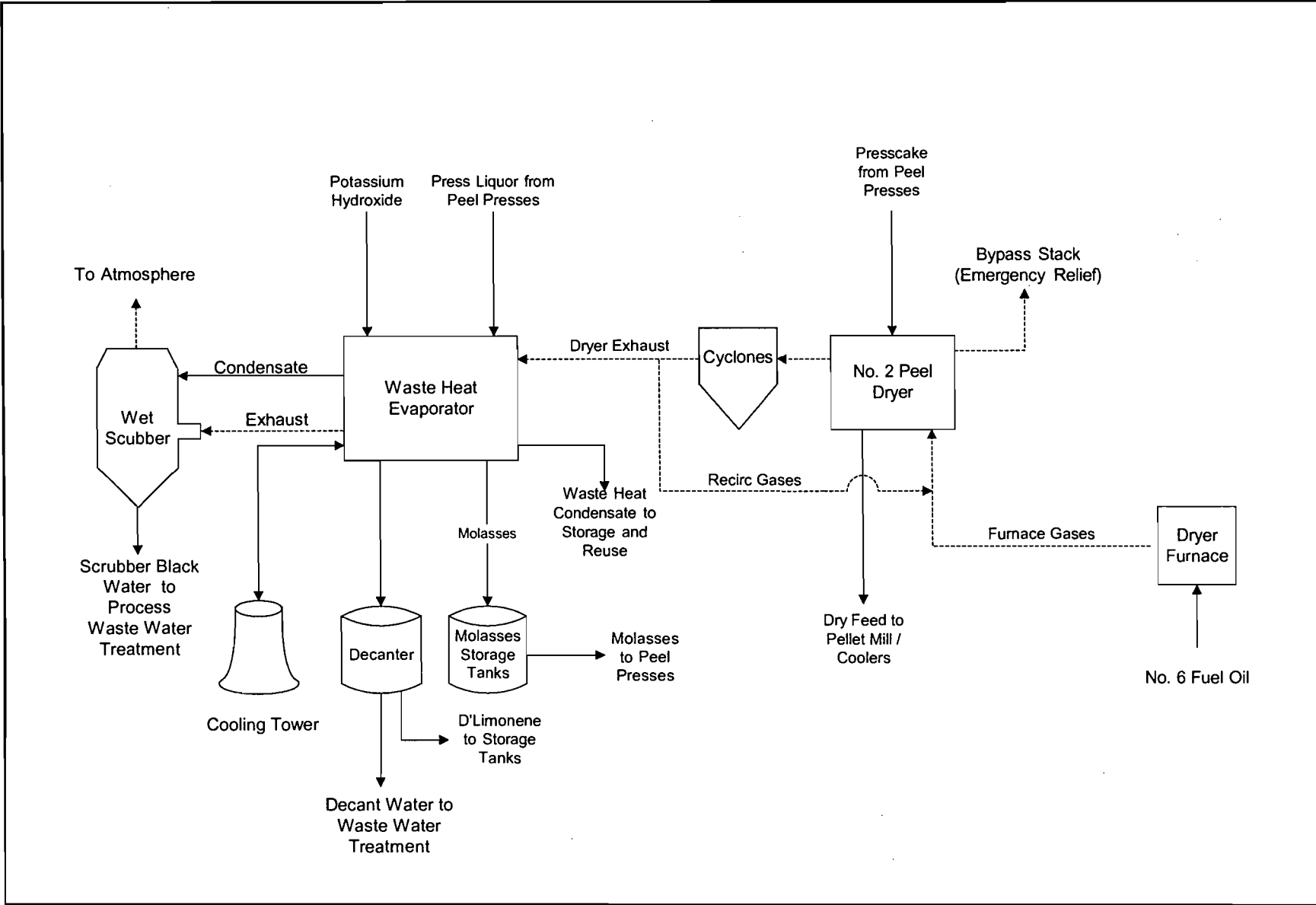
^b Based on 84 MMBtu/hr and 6,000 hours per year or 22.5 million boxes per year and 8.2 lb BDP/box.

BDP = bone dry peel

References:

1. Maximum emission rate based on Process Weight Formula, $E = 17.31E^{0.16}$, where E is in lb/hr and P = 47 TPY throughput rate [62-296.320(4)(a), F.A.C.].
2. Particulate matter (PM₁₀) emission factor for citrus peel dryers from FLL 403.08725(2)(e)1.
3. Based on emission limit of existing peel dryer/WHE. This dryer will be able to meet this limit since it will burn a fuel oil with a lower sulfur content than the existing peel dryer/WHE (fuel oil combustion is the primary source of SO₂ emissions from this emission unit).
4. Nitrogen oxide emission factors for sources that fire fuel oil from FLL 403.08725(2)(f)1.b.
5. Based on 160% of VOC emissions, derived from stack test data.
6. Emission factor based on General FCPA Emission Factor, maximum production rates and:
 Early/Mids -- 0.4275 lb oil/box and a hourly minimum of 50% oil recovery (51.67% overall oil recovered/juice/sewered).
 Valencia -- 0.6076 lb oil/box and a hourly minimum of 50% oil recovery (51.67% overall oil recovered/juice/sewered).
 Annual Average - assumes a 50/50 mix of Valencia and Early/Mids and an annual average of 55% oil recovery (56.67% overall oil recovered/juice/sewered).
 Based on 90 lb fruit/box; 8.2 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: No. 2 Peel Dryer/Waste Heat Evaporator
 Filename: SG-FIGS.VSD
 Latest Revision Date: 7/6/01

Process Flow Legend:

Solid / Liquid	→
Gas	- - - - -
Steam	- · - · -



ATTACHMENT SG-EU1-J2
FUEL ANALYSIS OR SPECIFICATION

ATTACHMENT SG-EU1-J2**Fuel Analysis Specification for Southern Gardens Citrus Processing Corporation
Peel Dryer/Waste Heat Evaporator**

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
Peel Dryer/Waste Heat Evaporator Wet Collection Control Equipment 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 similar equipment controlling emissions at the existing Citrus Feed Mill.

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

<p>1. Type of Emissions Unit Addressed in This Section: (Check one)</p> <p><input checked="" type="checkbox"/> 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).</p> <p><input type="checkbox"/> 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.</p> <p><input type="checkbox"/> 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.</p>			
<p>2. Regulated or Unregulated Emissions Unit? (Check one)</p> <p><input checked="" type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.</p> <p><input type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.</p>			
<p>3. Description of Emissions Unit Addressed in This Section (limit to 60 characters): No. 4 Pellet Cooler</p>			
<p>4. Emissions Unit Identification Number: ID:</p>			<p><input checked="" type="checkbox"/> No ID <input type="checkbox"/> ID Unknown</p>
<p>5. Emissions Unit Status Code: C</p>	<p>6. Initial Startup Date:</p>	<p>7. Emissions Unit Major Group SIC Code: 20</p>	<p>8. Acid Rain Unit? <input type="checkbox"/></p>
<p>9. Emissions Unit Comment: (Limit to 500 Characters) 4-Digit SIC code = 2037. This emissions unit consists of a new pellet mill and the No. 4 Pellet Cooler.</p>			

Emissions Unit Control Equipment

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

Cyclones are an integral part of the process and are not considered as control equipment.

2. Control Device or Method Code(s):

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:		mmBtu/hr
2. Maximum Incineration Rate:	lb/hr	' tons/day
3. Maximum Process or Throughput Rate:	46,000 lb/hr	
4. Maximum Production Rate:	46,000 lb/hr	
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):		
Maximum rates relate to total pounds of citrus peel.		

**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? CFM2		2. Emission Point Type Code: 1	
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:			
5. Discharge Type Code: V	6. Stack Height: 40 feet	7. Exit Diameter: 2 feet	
8. Exit Temperature: 110 °F	9. Actual Volumetric Flow Rate: 13,900 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): Exit stack of cyclone.			

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

Segment Description and Rate: Segment 1 of 1

1. Segment Description (Process/Fuel Type) (limit to 500 characters): Food and Agriculture, Feed Manufacture, Pellet Cooler		
2. Source Classification Code (SCC): 3-02-008-16		3. SCC Units: Tons Processed
4. Maximum Hourly Rate: 23	5. Maximum Annual Rate: 138,000	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit: 0
10. Segment Comment (limit to 200 characters): Hourly and annual rates refer to total dry citrus peel through cooler.		

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):		

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: 5.0 lb/hour 15.0 tons/year	4. Synthetically Limited? <input checked="" type="checkbox"/>
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 _____ to _____ tons/year	
6. Emission Factor: 5.0 lb/hr Reference: See Att. SG-EU2-G8	7. Emissions Method Code: 0
8. Calculation of Emissions (limit to 600 characters): See Attachment SG-EU2-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 1 of 1

1. Basis for Allowable Emissions Code: OTHER	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: 5.0 lb/hr	4. Equivalent Allowable Emissions: 5.0 lb/hour 15.0 tons/year
5. Method of Compliance (limit to 60 characters): VE < 5% opacity	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): As per FLL 403.08725(3)(i)1., compliance tests are waived as long as compliance with visible emission limit is shown. Limit set forth in FLL 403.08725(2)(e)2.	

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

Potential/Fugitive Emissions

1. Pollutant Emitted: PM₁₀		2. Total Percent Efficiency of Control:	
3. Potential Emissions: 5.0 lb/hour		4. Synthetically Limited? [X]	
		15.0 tons/year	
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 _____ to _____ tons/year			
6. Emission Factor: 5.0 lb/hr Reference: FLL 403.08725(2)(e)2.		7. Emissions Method Code: 0	
8. Calculation of Emissions (limit to 600 characters): See Attachment SG-EU2-G8			
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): Proposed hours of operation are 6,000 hr/yr.			

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: 5.0 lb/hr		4. Equivalent Allowable Emissions: 5.0 lb/hour 15.0 tons/year	
5. Method of Compliance (limit to 60 characters): VE < 5% opacity			
6. Allowable Emissions Comment.(Desc. of Operating Method) (limit to 200 characters): As per FLL 403.08725(3)(i)1., compliance tests are waived as long as compliance with visible emission limit is shown. Limit set forth in FLL 403.08725(2)(e)2.			

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: VE05	2. Basis for Allowable Opacity: [] Rule [X] Other
3. Requested Allowable Opacity: Normal Conditions: 5 % 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): FLL 403.08725(2)(g)2.	

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

Continuous Monitoring System: Continuous Monitor _____ of _____

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	[] Rule [] 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):	

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

Supplemental Requirements

1. Process Flow Diagram <input checked="" type="checkbox"/> Attached, Document ID: <u>SG-EU2-J1</u> <input type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
2. Fuel Analysis or Specification <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
3. Detailed Description of Control Equipment <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
4. Description of Stack Sampling Facilities <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
5. Compliance Test Report <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously submitted, Date: _____ <input checked="" type="checkbox"/> Not Applicable
6. Procedures for Startup and Shutdown <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
7. Operation and Maintenance Plan <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
8. Supplemental Information for Construction Permit Application <input checked="" type="checkbox"/> Attached, Document ID: <u>Attachment A</u> <input type="checkbox"/> Not Applicable
9. Other Information Required by Rule or Statute <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
10. Supplemental Requirements Comment:

Additional Supplemental Requirements for Title V Air Operation Permit Applications

11. Alternative Methods of Operation <input type="checkbox"/> Attached, Document ID:_____ <input type="checkbox"/> Not Applicable
12. Alternative Modes of Operation (Emissions Trading) <input type="checkbox"/> Attached, Document ID:_____ <input type="checkbox"/> Not Applicable
13. Identification of Additional Applicable Requirements <input type="checkbox"/> Attached, Document ID:_____ <input type="checkbox"/> Not Applicable
14. Compliance Assurance Monitoring Plan <input type="checkbox"/> Attached, Document ID:_____ <input type="checkbox"/> Not Applicable
15. Acid Rain Part Application (Hard-copy Required) <input type="checkbox"/> Acid Rain Part - Phase II (Form No. 62-210.900(1)(a)) Attached, Document ID:_____ <input type="checkbox"/> Repowering Extension Plan (Form No. 62-210.900(1)(a)1.) Attached, Document ID:_____ <input type="checkbox"/> New Unit Exemption (Form No. 62-210.900(1)(a)2.) Attached, Document ID:_____ <input type="checkbox"/> Retired Unit Exemption (Form No. 62-210.900(1)(a)3.) Attached, Document ID:_____ <input type="checkbox"/> Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.) Attached, Document ID:_____ <input type="checkbox"/> Phase NOx Averaging Plan (Form No. 62-210.900(1)(a)5.) Attached, Document ID:_____ <input type="checkbox"/> Not Applicable

ATTACHMENT SG-EU2-G8
CALCULATION OF EMISSIONS

Attachment SG-EU2-G8. Future Potential Emissions for New No. 4 Pellet Cooler 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)	5.0 lb/hr	1	--	5.0	6,000 hr/yr	15.0
Particulate (PM ₁₀)	5.0 lb/hr	2	--	5.0	6,000 hr/yr	15.0
VOC						
Early/Mids	4.54 lb/ton BDP	3	18.5 TPH BDP	83.9	--	--
Valencia	6.45 lb/ton BDP	3	18.5 TPH BDP	119.3	--	--
Annual Average	4.92 lb/ton BDP	3	--	--	92,250 TPY BDP	227.1

Footnotes:

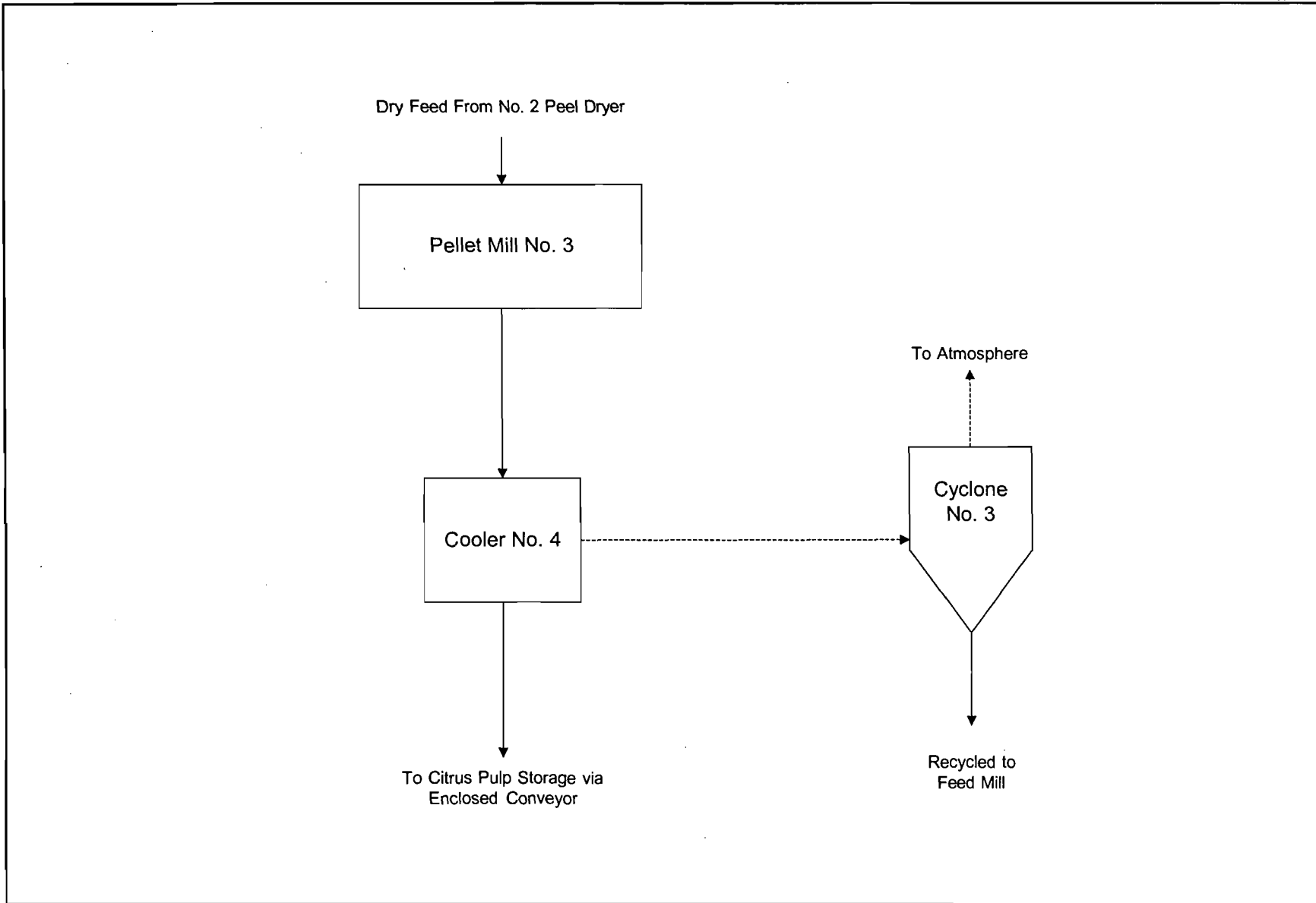
^a Based on maximum throughput rate.

^b Based on 22.5 million boxes of fruit per year, 8.2 lb bone dry peel per box and 6,000 hr/yr.

References:

1. Based on requested allowable emission rate.
2. Particulate matter (PM₁₀) limit for pellet coolers from FLL 403.08725(2)(e)2.
3. Emissions based on General FCPA Emission Factor, proposed maximum production rates and:
 Early/Mids -- 0.4275 lb oil/box and a hourly minimum of 50% oil recovery (51.67% overall oil recovered/juice/sewered).
 Valencia -- 0.6076 lb oil/box and a hourly minimum of 50% oil recovery (51.67% overall oil recovered/juice/sewered).
 Annual Average - assumes a 50/50 mix of Valencia and Early/Mids and an annual average of 55% oil recovery (56.67% overall oil recovered/juice/sewered).
 Based on 90 lb of fruit/box; 8.2 lb bone dry peel/box; 9% of oil to dryer emitted from pellet cooler.

**ATTACHMENT SG-EU2-J1
PROCESS FLOW DIAGRAM**



Attachment SG-EU2-J1
Southern Gardens Citrus Processing Corporation
Process Flow Diagram
Clewiston, Florida

Process Area: Pellet Mill No. 3/Cooler No. 4
Filename: SG-FIGS.VSD
Latest Revision Date: 7/6/01

Process Flow Legend:	
Solid / Liquid	→
Gas	- - - - ->
Steam	- · - · ->



ATTACHMENT A

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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 perform the following:

1. Increase the facility's maximum citrus fruit production capacity from 20 million boxes per year to 22.5 million boxes per year,
2. Install a used citrus peel dryer/waste heat evaporator, and
3. Install a pellet mill and pellet cooler to support the peel dryer operation.

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.

The SGCPC facility currently has a total of 39 citrus juice extractors, one citrus peel dryer/WHE, three pellet coolers, and four steam boilers. 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. However, due to increased demand, SGCPC is requesting that this facility production cap now be increased to 22.5 million boxes per year. The existing extractors are capable of accommodating this increased throughput on an annual basis.

SGCPC recently had an opportunity to purchase a used peel dryer/WHE at a favorable price from another citrus processing facility. SGCPC has purchased the used dryer/WHE, and now desires to bring it to the SGCPC plant site and install the dryer. The relocated peel dryer/WHE (identified as the No. 2 Peel Dryer/WHE) will be the same capacity as the existing peel dryer/WHE. Since the existing dryer/WHE is capable of accommodating the requested 22.5 million boxes per year facility production cap, the relocated No. 2 Peel Dryer/WHE would be used primarily as a backup unit at this time.

SGCPC is also proposing the addition of a new pellet mill and cooler to support the additional peel dryer. The new No. 4 Cooler will be similar to the existing No. 3 Cooler.

Note that SGCPC currently is exploring the possibility of further expanding the plant's production capacity, although there are no firm plans to expand at this time. Accordingly, SGCPC believes that it is appropriate to permit the proposed No. 2 Peel Dryer/WHE as a backup unit and to take a "synthetic minor" limit of 22.5 million boxes per year to avoid prevention of significant deterioration (PSD) review. Facility expansion would require additional juice extractors to be installed. If this occurs, the proposed dryer/WHE could no longer operate only as a backup -- both the existing and the proposed dryer/WHE would need to operate to process the peel that would be generated by the expanded plant. SGCPC recognizes that, if a facility expansion is undertaken and the limit of 22.5 million boxes per year is raised, the applicability of PSD to the proposed peel dryer/WHE would have to be evaluated as a "relaxation" under Rule 62-212.400(2)(g). SGCPC requests DEP's concurrence with this applicability analysis.

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.

This report contains a project description and a regulatory analysis for this project. The regulatory analysis addresses the requirements set forth in the citrus industry legislation. This legislation requires certain emission limits and sets a minimum citrus oil recovery level to be met upon startup of a new or modified citrus plant.

2.0 PROJECT DESCRIPTION

2.1 EXISTING OPERATIONS

The SGPC facility currently has a total of thirty-nine (39) citrus juice extractors, one citrus peel dryer/WHE, 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.

Currently, SGPC operates one 60,000 lb/hr (water evaporation rate) peel dryer that has a maximum heat input rate of 84.0 million British thermal units (MMBtu). The maximum bone dry peel (BDP) input rate 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. SGPC 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.

SGPC's pellet mill consists of two pellet mills and three pellet coolers (Cooler Nos. 1, 2, and 3). The maximum permitted process rate through the pellet mill is 23.0 TPH, total both mills. Cooler No. 3 operates alone, while Cooler Nos. 1 and 2 are used simultaneously for standby operation when Cooler No. 3 is shutdown for repair or maintenance. Cooler Nos. 1 and 3 utilize a common cyclone collector, while Cooler No. 2 has its own cyclone collector. The cyclones are considered as inherent control equipment since they are utilized to collect product. The total maximum operating hours of the pellet mill are 6,000 hr/yr.

Four steam boilers operate to supply steam to the juice processing equipment. The four boilers are rated at 33.6, 33.6, 35.6 and 6.3 MMBtu/hr, respectively, and all burn No. 2 fuel oil with a maximum sulfur content of 0.5 percent. Total fuel oil consumption for all boilers is limited to 4,078,000 gal/yr.

The seven VOL storage tanks consist of two No. 2 fuel oil tanks, two No. 6 fuel oil storage tanks, and three d-limonene storage tanks. The maximum permitted throughput rates through the tanks are 4,078,000 gal/yr, 7,100,863 gal/yr and 1,000,000 gal/yr, respectively.

2.2 PROPOSED CHANGES TO FACILITY

Due to increased demand for citrus fruit processing, SGPCPC is requesting that the current facility production cap of 20 million boxes per year be increased to 22.5 million boxes per year. The existing extractors are capable of accommodating this increased throughput on an annual basis. For the 2000-2001 processing, the facility will process over 19 million boxes of fruit. The requested higher production cap is achievable with existing equipment.

As discussed in Section 1.0, the existing dryer/WHE is capable of accommodating the requested 22.5 million boxes per year facility production cap, and therefore the proposed No. 2 Peel Dryer/WHE will be used primarily as a backup unit at this time. The proposed peel dryer 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. 2 fuel oil with a maximum sulfur content of 1.5 percent. The proposed WHE will have a maximum capacity of 135,000 lbs/hr water evaporation rate. The maximum peel production rate of the proposed dryer is 18.5 tons of bone dry peel (BDP) per hour. The dryer/WHE will operate for a maximum of 6,000 hours per year.

The proposed No. 3 Pellet Mill and No. 4 Pellet Cooler will operate whenever the No. 2 Peel dryer operates, i.e., primarily as a backup unit. The cooler will utilize its own cyclone collector for product collection. The maximum process rate of dried citrus pellets for the new pellet mill and pellet cooler is 23.0 TPH.

2.3 AIR EMISSIONS

The maximum emissions from the No. 2 Peel dryer/WHE and No. 4 Pellet Cooler are presented in Attachment SG-EU1-G8 and Attachment SG-EU2-G8, respectively. A summary of the annual emissions from the No. 2 Peel Dryer/WHE and No. 4 Pellet Cooler are presented in Table 2-1. Note that these emissions reflect all 22.5 million boxes of fruit per year being processed solely through the No. 2 Peel Dryer/WHE. These emissions would only occur if the No. 2 Peel Dryer processed all of the fruit received at the facility. In reality, the No. 2 Peel Dryer will be used primarily as a backup unit, and actual emission will be much less than those shown in Table 2-1.

SGCPC is requesting to increase the permitted facility production capacity to 22.5 million boxes of fruit per year. The future potential emissions from the SGCPC facility, reflective of 22.5 million boxes of fruit per year, are presented in Table 2-2. To further limit emissions of volatile organic compounds (VOC) and carbon monoxide (CO) from the facility, SGCPC will commit to a minimum future oil recovery of 56.67 percent. This includes 55 percent oil recovery from citrus oils, and 1.67 percent from oil remaining in juice and oil discharged to the sewer.

Since either the existing dryer or the proposed dryer can potentially process all of the peel resulting from 22.5 million boxes of fruit per year, the maximum facility emissions are based on the maximum annual emissions from either peel dryer. Future maximum emissions from the existing No. 1 Peel Dryer/WHE, based on 22.5 million boxes per year, are shown in Table 2-2. Tables 2-1 and 2-2 can be compared to determine the worst-case future annual emissions for the peel dryers for each pollutant.

The future maximum facility emissions based on processing 22.5 million boxes per year are presented in Table 2-3. The maximum emissions from either peel dryer (not both) were used in determining the maximum future facility emissions. Also, the emissions from Pellet Coolers No. 1 and 2, or Pellet Cooler No. 3, or Pellet Cooler No. 4 (not all together) were used in determining the future facility emissions (all the pellet coolers emit the same on a pounds of pollutant per ton of BDP basis). It is noted that although Table 2-3 includes the four process steam boilers, the increase in fruit production will not affect the annual permitted capacity of the steam boilers.

3.0 RULE APPLICABILITY

3.1 FLORIDA CITRUS INDUSTRY LEGISLATION

The citrus industry has been exempted from obtaining air pollution operation and construction permitting by the citrus industry legislation [FLL 403.0872(12)]. Instead of the typical permitting process, the legislation establishes certain emission limits and a minimum citrus oil recovery level that must be met upon startup of a new or modified citrus facility.

The citrus industry legislation establishes standards that all existing citrus juice processing facilities must comply with starting July 1, 2002, in lieu of current air construction and operating permits. These standards apply to facilities that have a fruit processing capacity of 2 million boxes per year or more. For the purpose of this legislation, "new sources" means emissions units constructed or added to a facility on or after July 1, 2000 and "existing sources" means emissions units constructed or modified before July 1, 2000. The following sections describe the requirements of this legislation and how it applies to this project.

3.1.1 EMISSION LIMITS

New or modified emission units must comply with this legislation upon startup. Existing sources have until October 31, 2002 to comply with the applicable requirements of the legislation.

The citrus industry legislation establishes limits for VOC, sulfur dioxide (SO₂), particulate matter of 10 microns or less (PM₁₀), nitrogen oxides (NO_x), and visible emissions (VE). VOC emissions are controlled by achieving a minimum of 50 percent recovery of oil from the citrus fruits processed. The oil recovery is required to be measured every operational day and averaged over the days of facility operation during a calendar year. SGPCPC already complies with the 50 percent recovery oil requirement since it is a requirement of the existing PSD permit. SGPCPC is proposing a minimum of 55 percent oil recovery on an annual basis for recovered citrus oils (equivalent to 56.67 percent total oil recovery, including oil remaining in juice and oil sent to sewer). One year after EPA's approval of the legislation, 65 percent of recovery of oil must be achieved.

SO₂ emissions are limited by sulfur content in fuel. Under this legislation, SGPCPC can fire fuel oil with a maximum of 1.0 percent sulfur by weight since SGPCPC does not have access to natural gas. SGPCPC has until October 31, 2002 to comply with this requirement facility-wide, but the new dryer

must comply upon startup. In order to meet this requirement, SGCPC is proposing to burn fuel oil with a maximum sulfur content of 1.5 percent in the new peel dryer, but will meet an SO₂ emissions limit of 0.5 lb/MMBtu, which is equivalent to burning 0.5 percent sulfur fuel oil. Therefore, this meets the intent of the legislation. Historic SO₂ emissions testing at SGCPC has demonstrated that SO₂ removal occurs in the peel dryer/WHE system, and that a limit of 0.5 lb/MMBtu is achievable while burning 1.5 percent sulfur fuel oil.

As with the fuel sulfur content, SGCPC will have until October 31, 2002 to comply with all of the PM₁₀ emission standards applicable to its facility for sources that have not been constructed or modified since July 1, 2000. PM₁₀ emissions have been established for the following sources at citrus processing facilities:

- Citrus peel dryer,
- Pellet cooler or cooling reel,
- Process steam boilers,
- Combustion turbine,
- Duct burner, and
- Glass plant furnace

The PM₁₀ emission standards of concern for this project are for the citrus peel dryer and the pellet cooler. The PM₁₀ emission standard for citrus peel dryers is 15 lb/hr. The standard for the pellet cooler is 5 lb/hr.

NO_x emission standards have also been established for all of above sources with the exception of the pellet cooler. A NO_x standard has not been established for citrus peel dryers that fire natural gas, propane, ethanol, biogas, or d-limonene. For citrus peel dryers that fire fuel oil, the standard is 0.34 pounds per MMBtu. The new citrus dryer at the SGCPC facility will comply with the 0.34 pounds per MMBtu upon startup since it will fire No.6 fuel oil.

VE limits have been established for both citrus peel dryers and pellet coolers. The VE limit for the citrus peel dryer is 20 percent of opacity and the VE limit for the pellet cooler is 5 percent.

3.1.2 EMISSIONS DETERMINATIONS AND REPORTING

For all emissions for which SGPCPC is limited by the legislation, SGPCPC must determine the emissions for each calendar year and report to the Florida Department of Environmental Protection (FDEP) by April 1 of the following year. These emissions must be determined for each emissions unit by means of recordkeeping, test methods, averaging periods or other statistical conventions that meet the following requirements:

- Yield reliable data,
- Coincide with the emissions limit being measured,
- Represent the unit's performance; and
- Show the actual emissions of the unit.

Under the citrus legislation, SGPCPC is required to submit annual operating reports in accordance with FDEP's rules and annual and semiannual statements of compliance required under FDEP's Title V permitting rules. SGPCPC is also required to maintain all records that show compliance with the requirements of this legislation for five years.

Emission units subject to emission limiting standards for PM_{10} , NO_x , and VE are required to test emissions annually. PM emissions must be tested with Environmental Protection Agency (EPA) Method 5, provided that all PM emissions are assumed to PM_{10} . Under this legislation, SGPCPC will not have to test the PM emissions from the pellet cooler as long as compliance with the applicable VE limit is demonstrated. If the pellet cooler does not comply with the VE standard, a Method 5 test will need to be conducted within 30 days after the visible emissions test. Tests for VE must be conducted using EPA Method 9. Tests for NO_x emissions will be conducted using EPA Method 7E.

Sulfur content of fuel oil must be measured using the latest American Society for Testing and Materials methods suitable for determining sulfur content of fuel oil. SO_2 emissions are determined by using a mass balance using the sulfur content and the amount of fuel fired in the citrus peel dryer. The conversion of 2 pounds of SO_2 emitted for each pound of sulfur in the fuel fired will be used in the mass balance. In SGPCPC's case, compliance is proposed to be demonstrated by performing an annual SO_2 compliance test on the peel dryer/WHE stack.

SGPCPC will continue to be subject to emission fees under FDEP's Title V program. Commencing July 1, 2002, the allowable annual emissions for fee purposes will be computed as the emission limits

established in the legislation multiplied by the actual operation rates, heat input and hours of operation of each source for the previous operating year. If adequate records of actual heat input and operation rates are not maintained, it will be assumed that the source operated at its maximum capacity during hours of operation. If the hours of operation were not documented, it will be assumed that the source operated January 1 through May 31 and October 1 through December 31 of the previous operating year. The annual emissions fee shall be due and payable April 1 for the preceding calendar year.

3.2 PSD APPLICABILITY

Although PSD review for the proposed project is not required under the citrus industry legislation, an analysis is presented herein in the event that EPA ultimately disapproves of the legislation, and retroactive PSD review is required. The proposed project potentially affects all emitting units at the SGPCPC facility since the annual amount of fruit processed will increase.

SGPCPC received a PSD permit in December of 2000 for the addition of three citrus extractors to the facility. PSD review was triggered for PM, PM₁₀, SO₂, NO_x, CO, and VOC. Because the PSD permit was issued just recently, there is no historical two-year operating period which is representative of normal operations under the new PSD permit. In such cases, DEP rules provide that potential emissions shall equal actual emissions [Rule 62-210.200(12)(c), F.A.C.]. Therefore, the potential emissions reflected in the PSD permit constitute the baseline emissions for determining future PSD applicability.

The future potential emissions of the facility based on 22.5 million boxes/yr of fruit are compared to the PSD baseline emissions in Table 3-1. As shown, the proposed project will result in an increase in emissions of NO_x, CO, and VOC. However, all emission increases are below the PSD significant emission rates, as shown in Table 3-1. As a result, PSD review would not apply to the proposed project.

As described in Section 1.10, SGPCPC currently is exploring the possibility of further expanding the plant's production capacity, although there are no firm plans to expand at this time. Accordingly, SGPCPC believes that it is appropriate to permit the proposed No. 2 Peel Dryer/WHE as a backup unit and to take a "synthetic minor" limit of 22.5 million boxes per year to avoid prevention of significant deterioration (PSD) review. Facility expansion would require additional juice extractors to be

installed. If this occurs, the No. 2 Peel Dryer/WHE could no longer operate only as a backup -- both the existing and the proposed peel dryer/WHE would need to operate to process the peel that would be generated by the expanded plant. SGPCPC recognizes that, if a facility expansion is undertaken and the limit of 22.5 million boxes per year is raised, the applicability of PSD to the No. 2 Peel Dryer/WHE would have to be evaluated as a "relaxation" under Rule 62-212.400(2)(g). This rule addresses relaxations in permitted capacity under the PSD regulations:

(g) Relaxations of Restrictions on Pollutant Emitting Capacity. If a previously permitted facility or modification becomes a facility or modification which would be subject to the preconstruction review requirements of this rule if it were a proposed new facility or modification solely by virtue of a relaxation in any federally enforceable limitation on the capacity of the facility or modification to emit a pollutant (such as a restriction on hours of operation), which limitation was established after August 7, 1980, then at the time of such relaxation the preconstruction review requirements of this rule shall apply to the facility or modification as though construction had not yet commenced on it.

Although this rule is not relevant to the current proposal, it could be at the time SGPCPC further expands the facility. SGPCPC requests DEP's concurrence with this applicability analysis.

3.3 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.

SGPCPC is proposing to relocate an existing citrus peel dryer/WHE 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." SGPCPC is relocating a portion of a process or production unit- the peel dryer/WHE. The entire citrus processing facility is not being relocated. Thus, SGPCPC 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 SGPCPC 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.

Table 2-1. Summary of Annual Emissions from No. 2 Peel Dryer/WHE and
No. 4 Pellet Cooler, Southern Gardens

Regulated Pollutant	Annual Emissions (TPY)		Total Emissions (TPY)
	No. 2 Dryer/WHE	No. 4 Pellet Cooler	
Particulate (PM)	96.2	15.0	111.2
Particulate (PM ₁₀)	45.0	15.0	60.0
Sulfur Dioxide	126.0	--	126.0
Nitrogen Oxides	85.7	--	85.7
Carbon Monoxide	2,906.3	--	2,906.3
Volatile Organic Componds	1,816.5	227.1	2,043.5

Table 2-2. Future Potential Emissions for Peel Dryer No. 1 with a Process Rate of 22.5 Million Boxes Per Year (55% Oil Recovery) ^a

Regulated Pollutant	Emission Factor	Reference	Short-Term Activity Factor ^a	Maximum Hourly Emissions (lb/hr)	Annual Activity Factor ^b	Annual Emissions (TPY)
Particulate (PM)	32.05 lb/hr	1	--	32.05	6,000 hr/yr	96.15
Particulate (PM ₁₀)	100% of PM	2	--	32.05	6,000 hr/yr	96.15
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	27.7	92,250 tons/yr BDP	69.2
Carbon monoxide						
Early/Mids	58.05 lb/ton BDP	5	18.5 tons/hr BDP	1,071.1	--	--
Valencia	82.51 lb/ton BDP	5	18.5 tons/hr BDP	1,522.3	--	--
Annual Average	63.01 lb/ton BDP	5	--	--	92,250 tons/yr BDP	2,906.3
VOC						
Early/Mids	36.28 lb/ton BDP	6	18.5 tons/hr BDP	669.4	--	--
Valencia	51.57 lb/ton BDP	6	18.5 tons/hr BDP	951.4	--	--
Annual Average	39.38 lb/ton BDP	6	--	--	92,250 tons/yr BDP	1,816.5

Footnotes:

- ^a Proposed throughput rate and maximum heat input rate.
 - ^b Based on 84 MMBtu/hr and 6,000 hours per year or 22.5 million boxes per year and 8.2 lb BDP/box.
- BDP = bone dry peel

References:

1. Maximum emission rate based on Process Weight Formula, $E = 17.31E^{0.16}$, where E is in lb/hr and P = 47 TPY throughput rate [62-296.320(4)(a), F.A.C.].
 2. Conservative assumption.
 3. Permitted emission limit.
 4. Maximum emissions based on stack test data.
 5. Based on 160% of VOC emissions, derived from stack test data.
 6. Emission factor based on General FCPA Emission Factor, maximum production rates and:
 - Early/Mids -- 0.4275 lb oil/box and a hourly minimum of 50% oil recovery (51.67% overall oil recovered/juice/sewered).
 - Valencia -- 0.6076 lb oil/box and a hourly minimum of 50% oil recovery (51.67% overall oil recovered/juice/sewered).
 - Annual Average - assumes a 50/50 mix of Valencia and Early/Mids and an annual average of 55% oil recovery (56.67 overall oil recovered/juice/sewered).
- Based on 90 lb fruit/box; 8.2 lb BDP/box; 72% of oil to dryer emitted from dryer stack.

Table 2-3. Future Potential Emissions for Southern Gardens Citrus Processing Corporation with a Process Rate of 22.5 Million Boxes Per Year (55% Oil Recovery) ^a

Regulated Pollutant	Future Potential Emissions (TPY)					Total Future Emissions (TPY)
	Peel Dryer No. 1	Peel Dryer No. 2	Maximum of Peel Dryers	Pellet Cooler Nos. 1-4	Boiler ^b Nos. 1-4	
Particulate (PM)	96.2	96.2	96.2	15.0	4.1	115.3
Particulate (PM ₁₀)	96.2	45.0	96.2	15.0	2.0	113.2
Sulfur dioxide	126.0	126.0	126.0	--	140.7	266.7
Nitrogen oxides	69.2	85.7	85.7	--	40.8	126.5
Carbon monoxide	2,906.3	2,906.3	2,906.3	--	10.2	2,916.5
VOC	1,816.5	1,816.5	1,816.5	226.9	1.0	2,044.4

Footnotes:

^a The 55% oil recovery reflects actual recovered oils only (cold press oil, d-limonene, and oil phase essence).

Overall oil recovery, including oil remaining in juice and oil sent to sewer, is 56.67%.

^b Based on emissions presented in PSD application for extractor additions submitted to FDEP 9/00.

Table 3-1. Net Emission Increases for Southern Gardens Citrus Processing Corporation

Pollutant	Total Future Emissions (TPY)	Baseline ^a (TPY)	Net Change (TPY)	PSD Significant Emission Rate (TPY)	PSD Review Applies?
Particulate (PM)	115.3	115.3	0	25	No
Particulate (PM ₁₀)	113.2	113.2	0	15	No
Sulfur dioxide	266.7	266.7	0	40	No
Nitrogen oxides	126.5	102.3	24	40	No
Carbon monoxide	2,916.5	2,892	25	100	No
VOC	2,044.4	2,026	18	40	No

Footnotes:

^a Baseline emissions are based on future maximum emissions from the PSD application for the new juice extractors (9/00).

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 Vice President & General Manager
 Southern Gardens Citrus Processing Corporation
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State of Florida
County of Hendry

Before the undersigned authority, personally appeared Debra Miller, who on oath says she is the Editor of the Clewiston News, a weekly newspaper published at Clewiston in Hendry County, Florida, that the attached copy of advertisement being a Public Notice in the matter of Intent to Issue Air Construction Permit

_____ in the _____ court, was published in said newspaper in the issue(s) of October 24, 2001

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 periodicals 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 she 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.

Debra Miller

Sworn to and subscribed before me this 24 day of Oct 2001

Siffany Koon
Notary Public



cc: E. Svec
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NOV 07 2001

BUREAU OF AIR REGULATION

PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
DEP File No. 0510015-008-AC
Southern Gardens Citrus Processing Corporation
Hendry County

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit to Southern Gardens Citrus Processing Corporation for its existing citrus office processing facility located at 755 CR 833, Clewiston, Hendry County. The applicant's mailing address is: Post Office Box 130, Clewiston, Florida 33440. The permit is to authorize the installation of a used fryer 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 with the identical capacities of the existing peel dryer. The proposed peel dryer will be connected to the existing waste heat evaporator and will operate solely as a backup to the existing peel dryer. Due to the physical limitations associated with the existing waste heat evaporator, both dryers cannot be operated simultaneously. The proposed peel dryer will be vented through the existing waste heat evaporator and stack, which is controlled by a wet scrubber referenced above. The applicant did not seek any relaxation in currently enforceable conditions in its other existing emissions units. There will be no actual emission increases due to this project.

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

The Department will accept written comments concerning the proposed permit issuance action for a period of fourteen (14) days from the date of publication of this Public Notice of Intent to Issue Air Construction Permit. Written comments should be provided to the Department's Bureau of Air Regulation at 2600 Blair Stone Road, Mail 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 in 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 Sections 120.569 and 120.57, Florida Statutes (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 permit decision may petition for an administrative proceeding (hearing) under Section 120.569 and 120.57, F.S. 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, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Department for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the 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 request an administrative determination (hearing) under Section 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervenor will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28.106.205, Florida Administrative Code (F.A.C.).

A petition that disputes the material facts upon which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each 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, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and (g) A statement of the relief sought by the petitioner, stating the action petitioner wishes 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 action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301 F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the Departments 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, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Dept. of Environmental Protection
Bureau of Air Regulation
Suite 4, 111 S. Magnolia Drive
Tallahassee, Florida 32301
Telephone: 850/488-0114
Fax: 850/922-6979
Dept. of Environmental Protection
South District
2295 Victoria Avenue, Suite 364W
Fort Myers, Florida 33901
Telephone: 941/332-6975

The complete project file includes the application, technical evaluation, draft permit, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Administrator, Title V Section, or the Department's reviewing engineer for this project, Edward J. Svec, Engineer IV, at the Bureau of Air Regulation in Tallahassee, Florida, or call 850/488-0114, for additional information. Written comments directed to the Department's reviewing engineer should be sent to the following mailing address: Dept. of Environmental Protection, Bureau of Air Regulation, Mail Station #5505, Tallahassee, Florida 32399-2400. 235481 - CN 10/24/01

The Clewiston News

Published Weekly

Clewiston, Florida

AFFIDAVIT OF PUBLICATION

State of Florida
County of Hendry

Before the undersigned authority, personally appeared Debra Miller, who on oath says she is the Editor of the Clewiston News, a weekly newspaper published at Clewiston in Hendry County, Florida, that the attached copy of advertisement being a Public Notice in the matter of Intent to Issue Air Construction Permit DEP File No. 0510015-006-AC

_____ in the _____ court, was published in said newspaper in the issue(s) of October 17, 2001

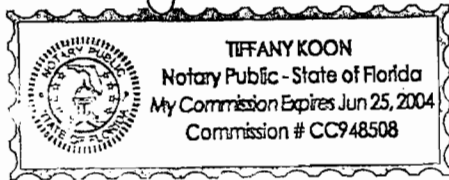
Affiant further says that the said Clewiston News is a newspaper published at Clewiston, in said Hendry County, continuously published in said Hendry County, Florida, each week, and has been entered as periodicals matter at the post office in Clewiston, in said Hendry County, Florida, for a period of one year next preceding the first publication says that she 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.

Debra Miller

Sworn to and subscribed before me this 17 day of October 2001

Tiffany Koon

Notary Public



RECEIVED

OCT 18 2001

D.E.P. - South District

Dept. of Environmental Protection
South District
2295 Victoria Avenue, Suite 346W
Fort Myers, Florida 33901
Telephone: 941/332-6975

The complete project file includes the application, technical evaluation, draft permit, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Administrator, Title V Section, or the Department's reviewing engineer for this project, Edward J. Svec, Engineer IV, at the Bureau of Air Regulation in Tallahassee, Florida, or call 850/488-0114, for additional information. Written comments directed to the Department's reviewing engineer should be sent to the following mailing address: Dept. of Environmental Protection, Bureau of Air Regulation, Mail Station #5505, Tallahassee, Florida 32399-2400. 233283 - CN 10/17/01

PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

DEP File No. 0510015-006-AC

Southern Gardens Citrus Processing Corporation
Hendry County

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit to Southern Gardens Citrus Processing Corporation for its existing citrus office processing facility located at 755 CR 833, Clewiston, Hendry County. The applicant's mailing address is: Post Office Box 130, Clewiston, Florida 33440. The permit is to authorize the installation of a used fryer 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 with the identical capacities of the existing peel dryer. The proposed peel dryer will be connected to the existing waste heat evaporator and will operate solely as a backup to the existing peel dryer. Due to the physical limitations associated with the existing waste heat evaporator, both dryers cannot be operated simultaneously. The proposed peel dryer will be vented through the existing waste heat evaporator and stack, which is controlled by a wet scrubber referenced above. The applicant did not seek any relaxation in currently enforceable conditions in its other existing emissions units. There will be no actual emission increases due to this project.

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

The Department will accept written comments concerning the proposed permit issuance action for a period of fourteen (14) days from the date of publication of this Public Notice of Intent to Issue Air Construction Permit. Written comments should be provided to the Department's Bureau of Air Regulation at 2600 Blair Stone Road, Mail 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 in 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 Sections 120.569 and 120.57, Florida Statutes (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 Section 120.569 and 120.57, F.S. 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, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Department for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the 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 request an administrative determination (hearing) under Section 120.569 and 120.57 F.S. or to intervene in this proceeding and participate as a party to it. Any subsequent intervenor will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28.106.205, Florida Administrative Code (F.A.C.)

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A complete project file is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Dept. of Environmental Protection
Bureau of Air Regulation
Suite 4, 111 S. Magnolia Drive
Tallahassee, Florida 32301
Telephone: 850/488-0114
Fax: 850/922-6979

SENDER: COMPLETE THIS SECTION

- 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, General
 Manager
 Southern Gardens Citrus
 Processing Corporation
 Post Office Box 130
 Clewiston, Florida 33440

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) _____

B. Date of Delivery 10-15-01

C. Signature
 X Tristan Sales Agent
 Addressee

D. Is delivery address different from item 1? Yes
 If 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)
 7000 0520 0020 9371 1625

PS Form 3811, July 1999 Domestic Return Receipt 10259-00-M-0952

**U.S. Postal Service
 CERTIFIED MAIL RECEIPT
 (Domestic Mail Only; No Insurance Coverage Provided)**

529T 1625
 74EB 9371
 0200 0200
 0250 0001
 7000 0520

Mr. Tristan Chapman

Postage	\$	Postmark Here
Certified Fee		
Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		
Total Postage & Fees	\$	

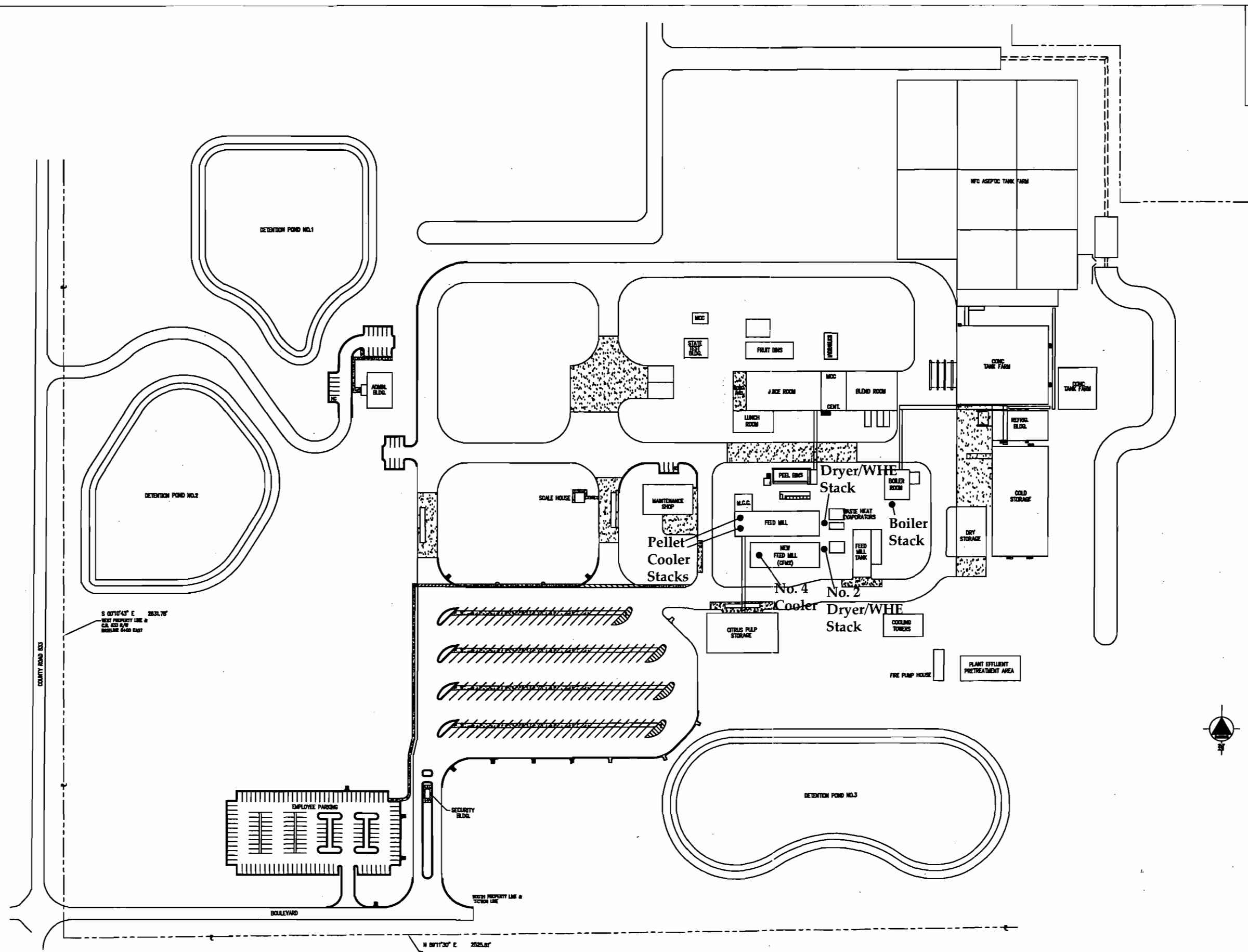
Recipient's Name (Please Print Clearly) (To be completed by mailer)
 Mr. Tristan Chapman
 Street, Apt. No.; or PO Box No.
 Post Office Box 130
 City, State, ZIP+4
 Clewiston, Florida 33440

PS Form 3800, February 2000 See Reverse for Instructions



Legend

- Stack Location



SENDER

PLACE STICKER AT TOP OF ENVELOPE
TO THE RIGHT OF RETURN ADDRESS

SECTION ON DELIVERY

- 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

A. Received by (Please Print Clearly) B. Date of Delivery

8-10-01

C. Signature

x *Andrea Sals*

- Agent
- Addressee

D. Is delivery address different from item 1?
 If YES, enter delivery address below:

- Yes
- No

3. Service Type

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

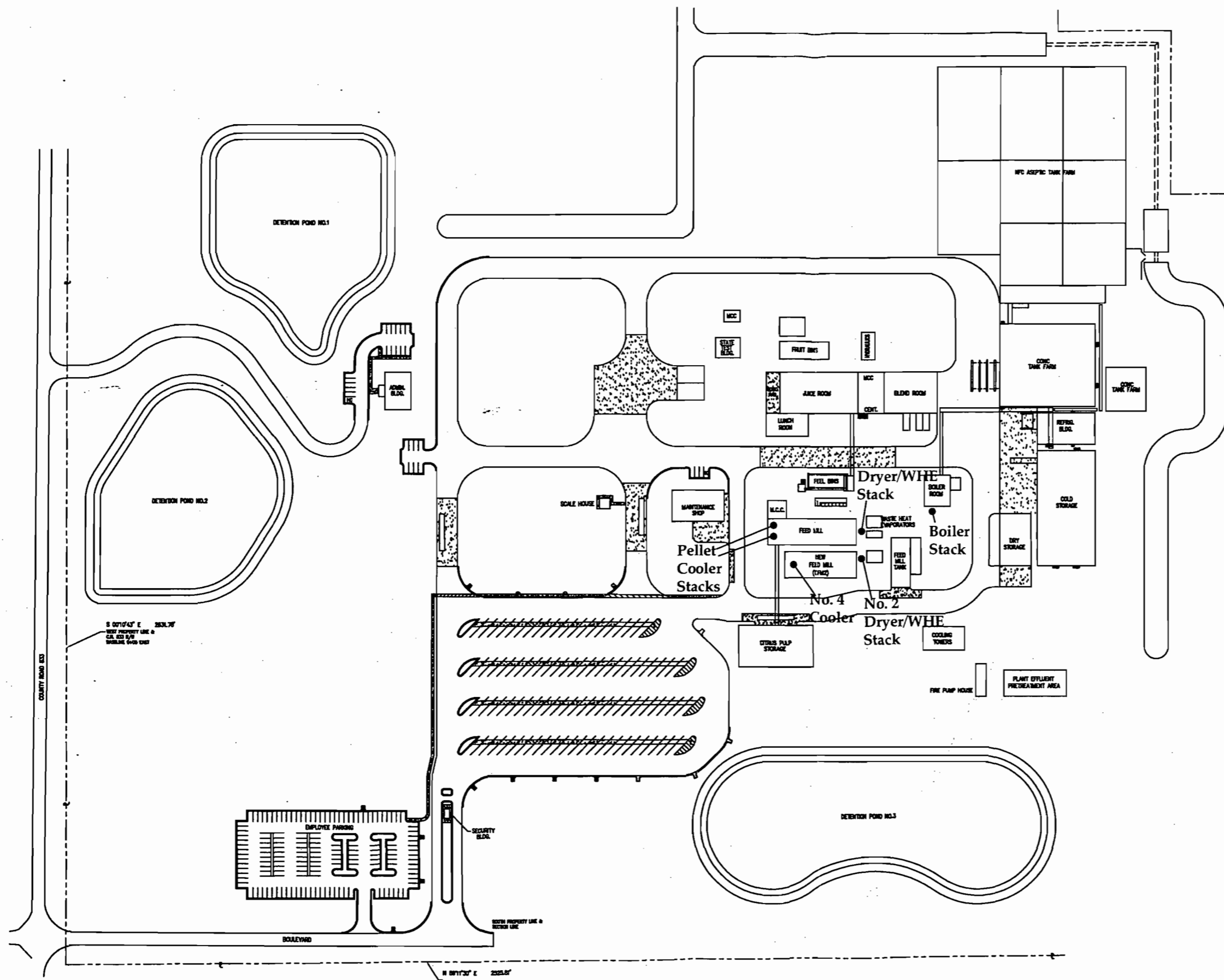
4. Restricted Delivery? (Extra Fee)

- Yes

2. Article Number (Copy from service label)
 7099 3400 0000 1451 2759

Legend

- Stack Location



**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**

RECEIVED

SEP 25 2001

BUREAU OF AIR REGULATION

DISTRIBUTION:

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

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)

- 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>I, the undersigned, am the owner or authorized representative*(check here [], if so) or the responsible official (check here [<input checked="" type="checkbox"/>], 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.</i>  _____ 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.

Signature

Date

*Attach any exception to certification statement.

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

[Empty box for Application Comment]

Facility Regulatory Classifications

Check all that apply:

1. <input type="checkbox"/> Small Business Stationary Source?	<input type="checkbox"/> Unknown
2. <input checked="" type="checkbox"/> Major Source of Pollutants Other than Hazardous Air Pollutants (HAPs)?	
3. <input type="checkbox"/> Synthetic Minor Source of Pollutants Other than HAPs?	
4. <input checked="" type="checkbox"/> Major Source of Hazardous Air Pollutants (HAPs)?	
5. <input type="checkbox"/> Synthetic Minor Source of HAPs?	
6. <input checked="" type="checkbox"/> One or More Emissions Units Subject to NSPS?	
7. <input type="checkbox"/> One or More Emission Units Subject to NESHAP?	
8. <input type="checkbox"/> 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

Title V Core List

Effective:03/25/97

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.

Title V Core List

Effective:03/25/97

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		4. Basis for Emissions Cap	5. Pollutant Comment
		lb/hour	tons/year		
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

Additional Supplemental Requirements for Title V Air Operation Permit Applications

8. List of Proposed Insignificant Activities: <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
9. List of Equipment/Activities Regulated under Title VI: <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Equipment/Activities On site but Not Required to be Individually Listed <input type="checkbox"/> Not Applicable
10. Alternative Methods of Operation: <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
11. Alternative Modes of Operation (Emissions Trading): <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
12. Identification of Additional Applicable Requirements: <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
13. Risk Management Plan Verification: <input type="checkbox"/> 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: _____) <input type="checkbox"/> Plan to be submitted to CEPPO (Date required: _____) <input type="checkbox"/> Not Applicable
14. Compliance Report and Plan: <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
15. Compliance Certification (Hard-copy Required): <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable

ATTACHMENT SG-FE-1
AREA MAP



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

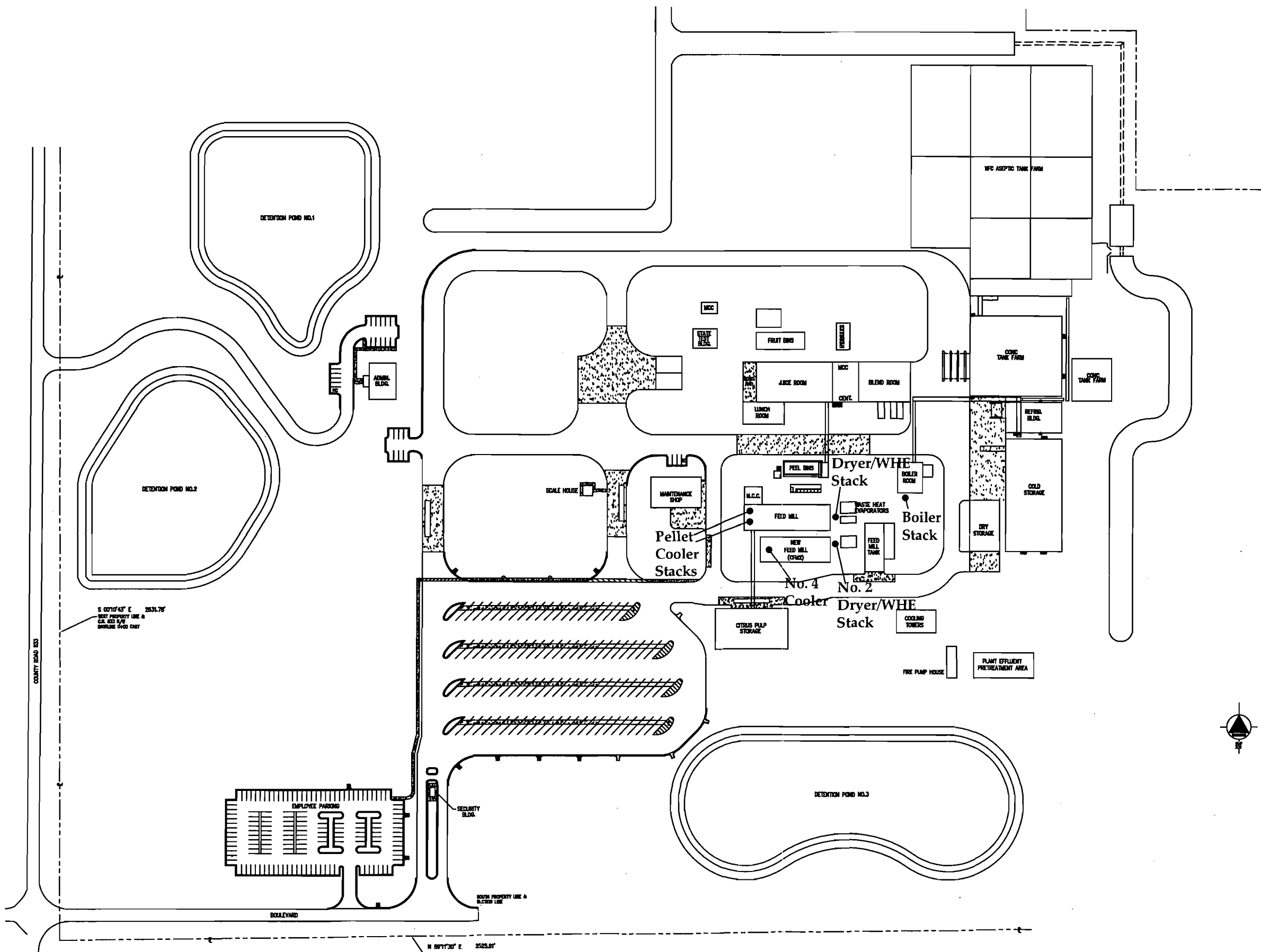
Source: Golder Associates Inc., 2001



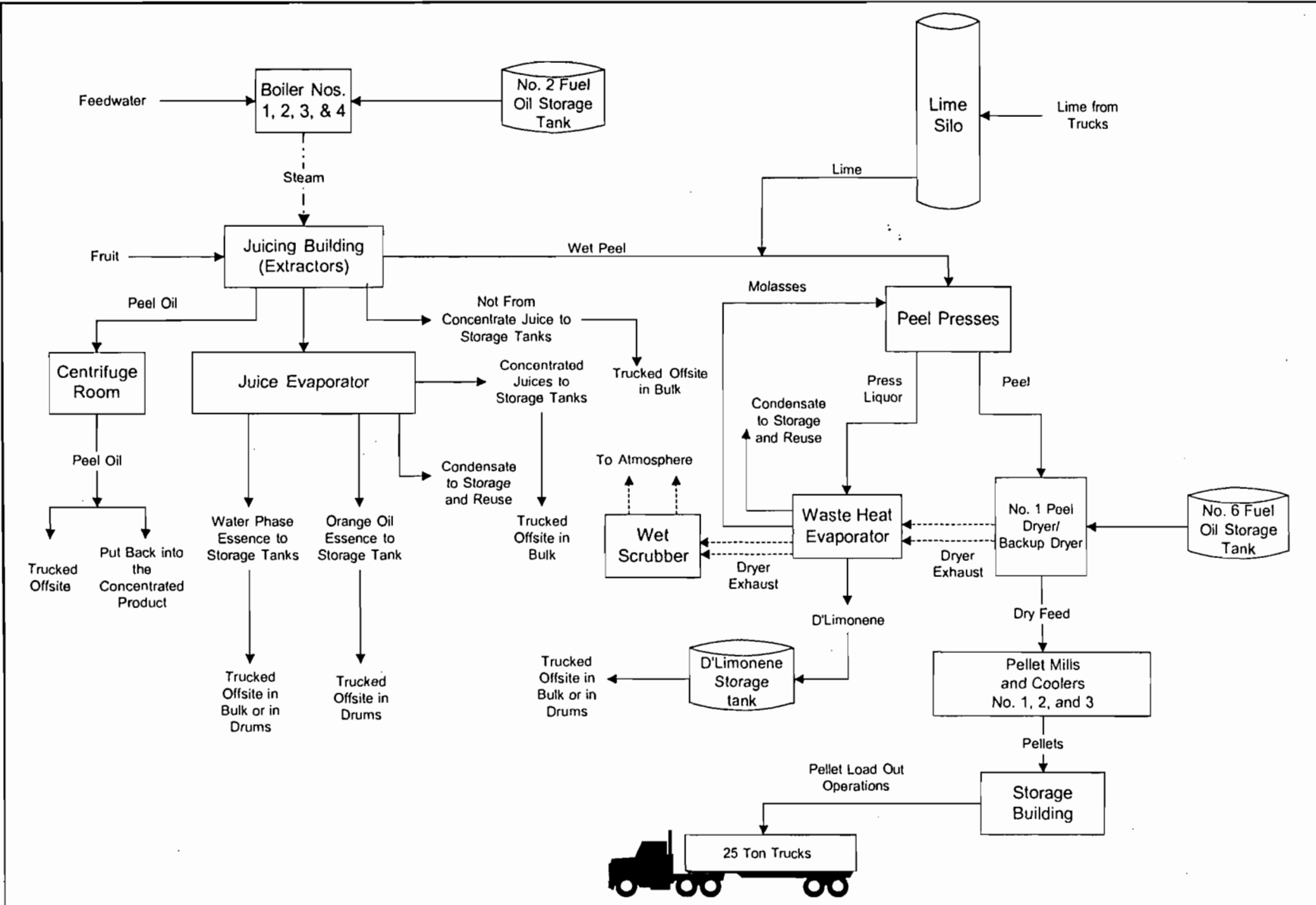
ATTACHMENT SG-FE-2
FACILITY PLOT PLAN

Legend

- Stack Location



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 - · - · - ->



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)			
<input checked="" type="checkbox"/> 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).			
<input type="checkbox"/> 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.			
<input type="checkbox"/> 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)			
<input checked="" type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.			
<input type="checkbox"/> 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:		<input checked="" type="checkbox"/> No ID <input type="checkbox"/> ID Unknown	
5. Emissions Unit Status Code: C	6. Initial Startup Date:	7. Emissions Unit Major Group SIC Code: 20	8. Acid Rain Unit? <input type="checkbox"/>
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):	
<p>Backup peel dryer will only operate when the existing peel dryer is shutdown. BDP = Bone dry peel</p> <p>1. Max Prod. Rate represents dried citrus peel at 0% moisture. 2. Process or throughput varies depending upon moisture content of peel.</p> <p>See Attachment SG-EU1-B6.</p>	

**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? <input checked="" type="checkbox"/>
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: PM₁₀		2. Total Percent Efficiency of Control:	
3. Potential Emissions: 32.05 lb/hour		4. Synthetically Limited? <input checked="" type="checkbox"/> [X]	
		96.2 tons/year	
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 _____ to _____ tons/year			
6. Emission Factor: 100% PM		7. Emissions Method Code:	
Reference: See Attachment SG-EU1-G8.		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: SO₂		2. Total Percent Efficiency of Control:	
3. Potential Emissions: 42 lb/hour 126 tons/year		4. Synthetically Limited? <input checked="" type="checkbox"/>	
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		4. Synthetically Limited? <input checked="" type="checkbox"/> [X]	
		67.5 tons/year	
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? <input checked="" type="checkbox"/>	
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		4. Synthetically Limited? <input checked="" type="checkbox"/> [X]	
		2,106.5 tons/year	
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: <input checked="" type="checkbox"/> Rule <input type="checkbox"/> 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:	<input type="checkbox"/> Rule <input checked="" type="checkbox"/> 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.	

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

1. Process Flow Diagram [X] Attached, Document ID: <u>SG-EU1-J1</u> [] Not Applicable [] Waiver Requested
2. Fuel Analysis or Specification [X] Attached, Document ID: <u>SG-EU1-J2</u> [] Not Applicable [] Waiver Requested
3. Detailed Description of Control Equipment [X] Attached, Document ID: <u>SG-EU1-J3</u> [] 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: <u>Attachment A</u> [] 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 <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
12. Alternative Modes of Operation (Emissions Trading) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
13. Identification of Additional Applicable Requirements <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
14. Compliance Assurance Monitoring Plan <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
15. Acid Rain Part Application (Hard-copy Required) <input type="checkbox"/> Acid Rain Part - Phase II (Form No. 62-210.900(1)(a)) Attached, Document ID: _____ <input type="checkbox"/> Repowering Extension Plan (Form No. 62-210.900(1)(a)1.) Attached, Document ID: _____ <input type="checkbox"/> New Unit Exemption (Form No. 62-210.900(1)(a)2.) Attached, Document ID: _____ <input type="checkbox"/> Retired Unit Exemption (Form No. 62-210.900(1)(a)3.) Attached, Document ID: _____ <input type="checkbox"/> Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.) Attached, Document ID: _____ <input type="checkbox"/> Phase NOx Averaging Plan (Form No. 62-210.900(1)(a)5.) Attached, Document ID: _____ <input type="checkbox"/> 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.

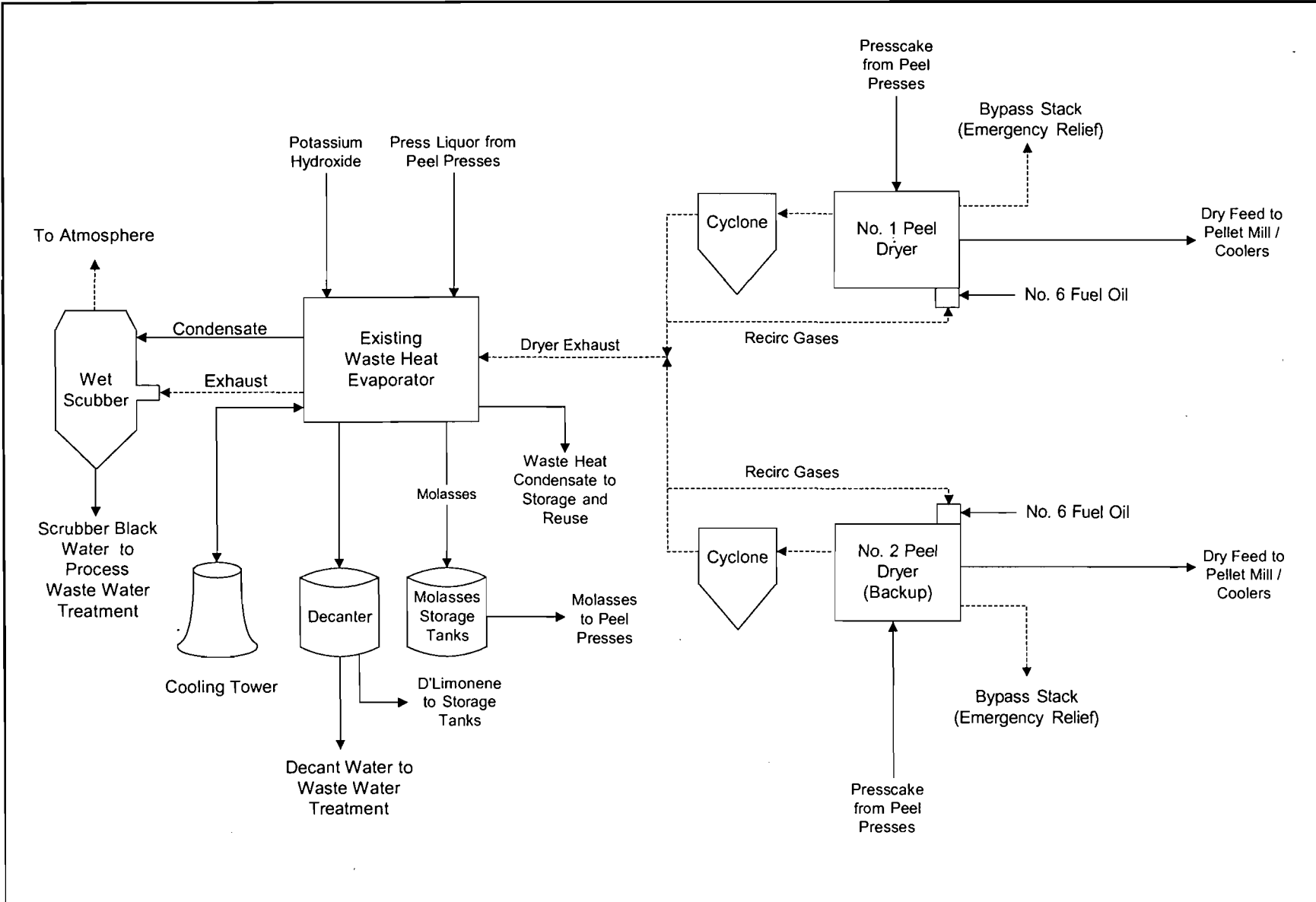
^b Based on 84 MMBtu/hr and 6,000 hours per year or 20 million boxes per year and 9.0 lb BDP/box.

BDP = bone dry peel

References:

- 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.
- Conservative assumption.
- Based on existing limit for No. 1 Peel Dryer.
- Maximum emissions based on No. 1 Peel Dryer stack test data.
- Based on 160% of VOC emissions, derived from No. 1 Peel Dryer stack test data.
- 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	- · - · -



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

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Attachment A

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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 SGPC 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 SGPC 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). SGPC 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

SGPC 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.

**AIR CONSTRUCTION PERMIT APPLICATION
FOR PEEL DRYER/WASTE HEAT EVAPORATOR
AND PELLET COOLER ADDITION**

**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**

**July 2001
0137555**

DISTRIBUTION:

**4 Copies - FDEP Tallahassee
1 Copy - FDEP Ft. Myers
2 Copies - Southern Gardens
2 Copies - Golder Associates Inc.**

Purpose of Application

Air Operation Permit Application

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

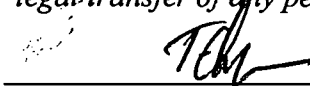
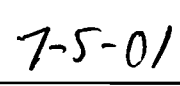
- Initial Title V air operation permit for an existing facility which is classified as a Title V source.
- Initial Title V air operation permit for a facility which, upon start up of one or more newly constructed or modified emissions units addressed in this application, would become classified as a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

- 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>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.</i>  _____  _____ Signature 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 [], 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.

Signature

(seal)

Date

David A. Buff

7/6/01

* Attach any exception to certification statement.

Construction/Modification Information

1. Description of Proposed Project or Alterations:

This application is for the addition of a peel dryer/waste heat evaporator and a pellet mill and cooler. The peel dryer/waste heat evaporator is existing equipment being moved from another citrus plant.

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

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

Application Comment

Facility Regulatory Classifications

Check all that apply:

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

List of Applicable Regulations

All Federal regulatory citations reflect the rule language as of June 2000.	
All State regulatory citations reflect the rule language as of June 2000.	
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.

Title V Core List

Effective:03/25/97

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		4. Basis for Emissions Cap	5. Pollutant Comment
		lb/hour	tons/year		
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

Additional Supplemental Requirements for Title V Air Operation Permit Applications

8. List of Proposed Insignificant Activities: <input type="checkbox"/> Attached, Document ID:_____ <input type="checkbox"/> Not Applicable
9. List of Equipment/Activities Regulated under Title VI: <input type="checkbox"/> Attached, Document ID:_____ <input type="checkbox"/> Equipment/Activities On site but Not Required to be Individually Listed <input type="checkbox"/> Not Applicable
10. Alternative Methods of Operation: <input type="checkbox"/> Attached, Document ID:_____ <input type="checkbox"/> Not Applicable
11. Alternative Modes of Operation (Emissions Trading): <input type="checkbox"/> Attached, Document ID:_____ <input type="checkbox"/> Not Applicable
12. Identification of Additional Applicable Requirements: <input type="checkbox"/> Attached, Document ID:_____ <input type="checkbox"/> Not Applicable
13. Risk Management Plan Verification: <input type="checkbox"/> 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:_____) <input type="checkbox"/> Plan to be submitted to CEPPO (Date required:_____) <input type="checkbox"/> Not Applicable
14. Compliance Report and Plan: <input type="checkbox"/> Attached, Document ID:_____ <input type="checkbox"/> Not Applicable
15. Compliance Certification (Hard-copy Required): <input type="checkbox"/> Attached, Document ID:_____ <input type="checkbox"/> Not Applicable

ATTACHMENT SG-FE-1
AREA MAP



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

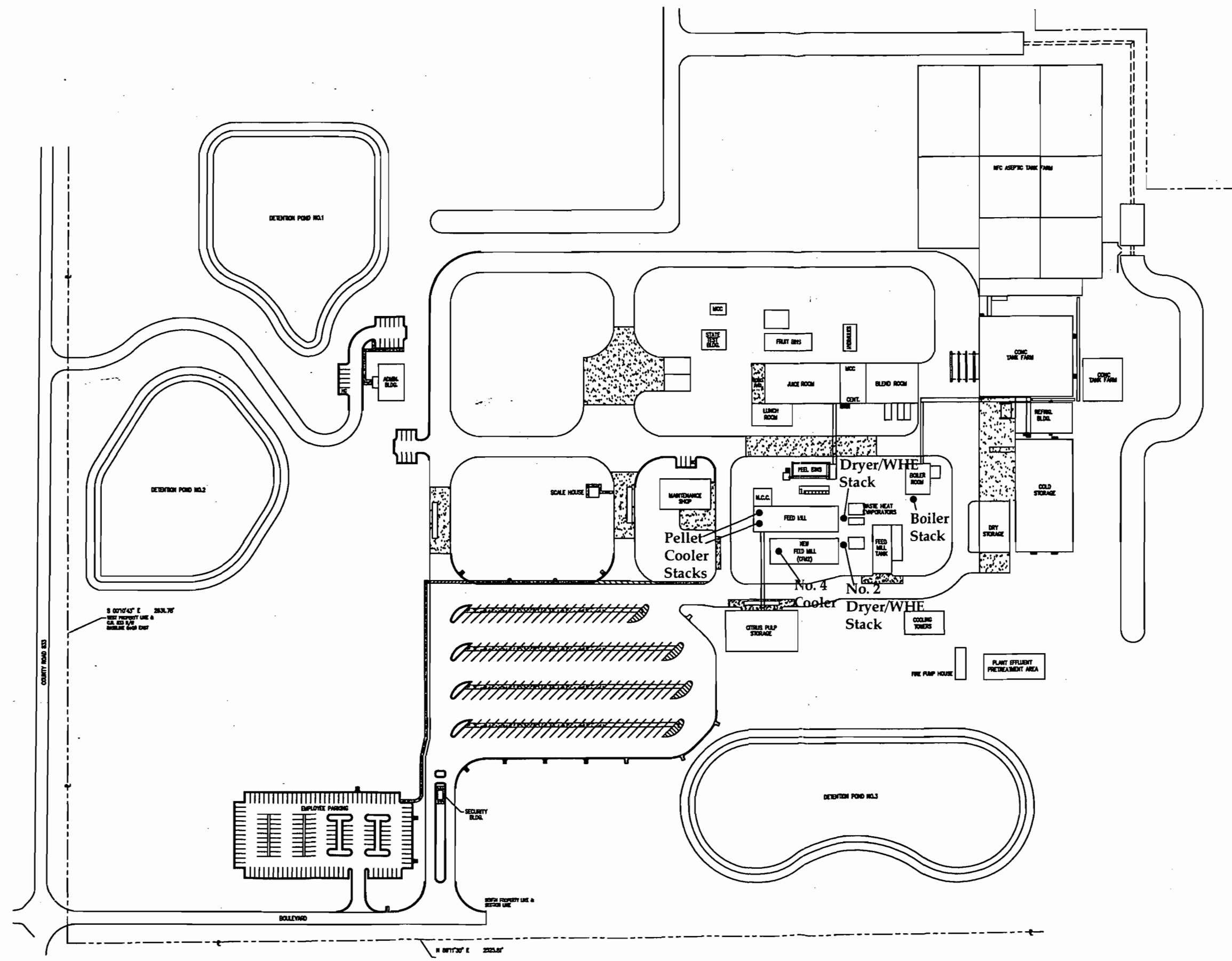
Source: Golder Associates Inc., 2001



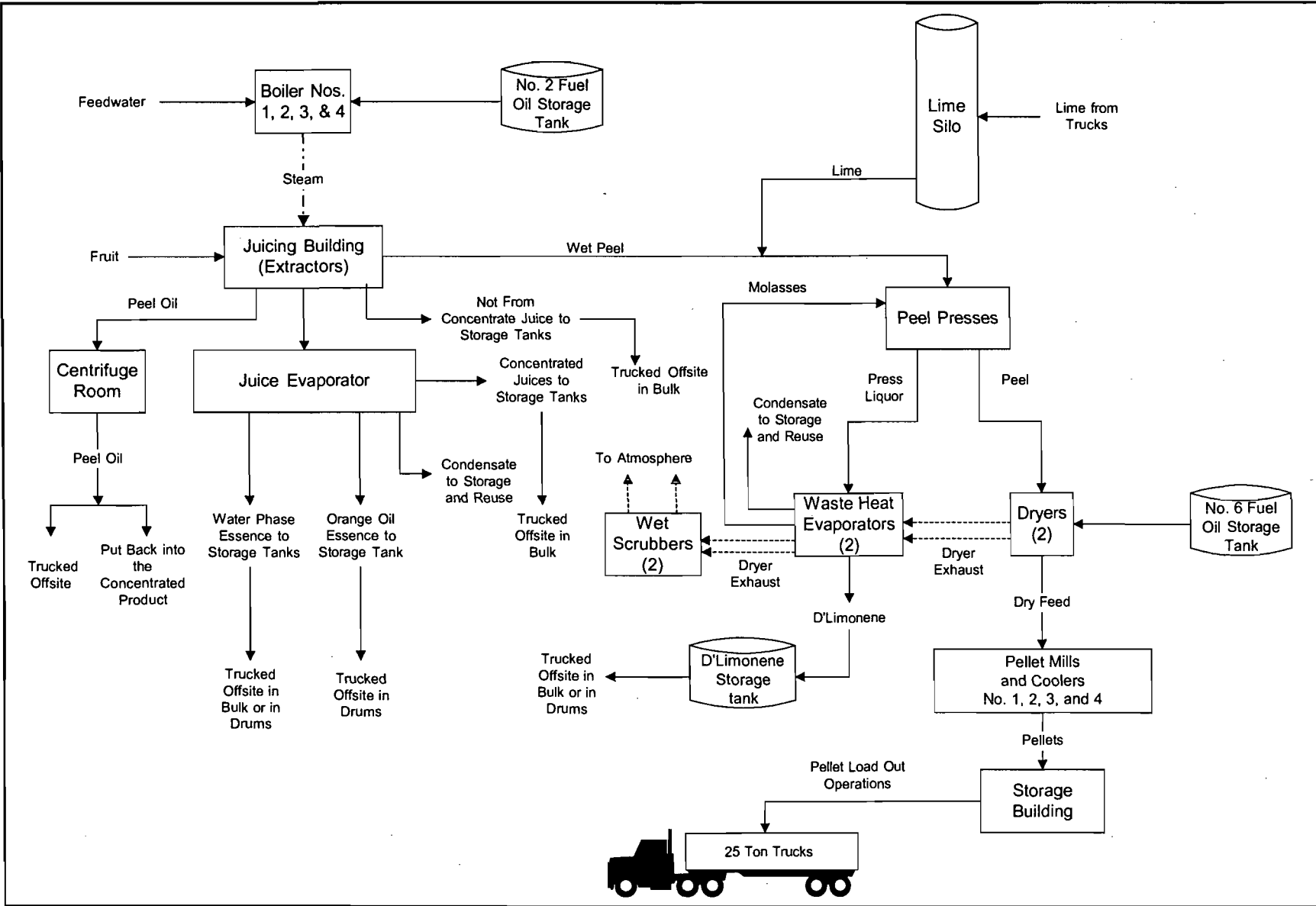
ATTACHMENT SG-FE-2
FACILITY PLOT PLAN

Legend

- Stack Location



**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: 7/6/01

Process Flow Legend:
 Solid / Liquid —————>
 Gas>
 Steam - - - - ->



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

<p>1. Type of Emissions Unit Addressed in This Section: (Check one)</p> <p><input checked="" type="checkbox"/> 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).</p> <p><input type="checkbox"/> 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.</p> <p><input type="checkbox"/> 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.</p>			
<p>2. Regulated or Unregulated Emissions Unit? (Check one)</p> <p><input checked="" type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.</p> <p><input type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.</p>			
<p>3. Description of Emissions Unit Addressed in This Section (limit to 60 characters): No. 2 Peel Dryer and Waste Heat Evaporator</p>			
<p>4. Emissions Unit Identification Number:</p> <p>ID:</p>		<p><input checked="" type="checkbox"/> No ID <input type="checkbox"/> ID Unknown</p>	
<p>5. Emissions Unit Status Code: C</p>	<p>6. Initial Startup Date:</p>	<p>7. Emissions Unit Major Group SIC Code: 20</p>	<p>8. Acid Rain Unit? <input type="checkbox"/></p>
<p>9. Emissions Unit Comment: (Limit to 500 Characters)</p> <p>4-Digit SIC code = 2037. The emission unit consists of a 135,000 lb/hr waste heat evaporator and a 60,000 lb/hr water evaporation dryer fired with fuel oil containing a maximum sulfur content of 1.5 percent by weight.</p>			

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):	
<p>BDP = Bone dry peel</p> <p>1. Max Prod. Rate represents dried citrus peel at 0% moisture.</p> <p>2. Process or throughput varies depending upon moisture content of peel.</p> <p>See Attachment SG-EU1-B6.</p>	

**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
FLL 403.08725(1) Compliance Requirements
FLL 403.08725(2)(c) Permitted Emission Limits
FLL 403.08725(2)(d) Permitted Emission Limits
FLL 403.08725(2)(e)1. Permitted Emission Limits
FLL 403.08725(2)(f)1. Permitted Emission Limits
FLL 403.08725(2)(g)1. Permitted Emission Limits
FLL 403.08725(3)(a) Emissions Determination and Reporting
FLL 403.08725(3)(b) Emissions Determination and Reporting
FLL 403.08725(3)(d) Emissions Determination and Reporting
FLL 403.08725(3)(h) Emissions Determination and Reporting
FLL 403.08725(3)(i)1. Emissions Determination and Reporting
FLL 403.08725(3)(i)2. Emissions Determination and Reporting
FLL 403.08725(3)(i)3. Emissions Determination and Reporting
FLL 403.08725(3)(j) Emissions Determination and Reporting
FLL 403.08725(3)(k) Emissions Determination and Reporting
FLL 403.08725(4)(a)1. Emissions Trading

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? CFM2		2. Emission Point Type Code: 1	
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:			
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):			

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: 92,250	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		EL
SO ₂			EL
NO _x			EL
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? <input checked="" type="checkbox"/>
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; E = 32.05 lb/hr	
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:	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: PM₁₀		2. Total Percent Efficiency of Control:	
3. Potential Emissions: 15 lb/hour		4. Synthetically Limited? [X]	
		45 tons/year	
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 _____ to _____ tons/year			
6. Emission Factor: 15 lb/hr Reference: FLL 403.08725(2)(e)1.		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 1 of 1

1. Basis for Allowable Emissions Code: OTHER		2. Future Effective Date of Allowable Emissions:	
3. Requested Allowable Emissions and Units: 15 lb/hr		4. Equivalent Allowable Emissions: 15 lb/hour 45 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 PM₁₀ limit for citrus peel dryers from FLL 403.08725(2)(e)1.			

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

Potential/Fugitive Emissions

1. Pollutant Emitted: SO₂		2. Total Percent Efficiency of Control:	
3. Potential Emissions: 42 lb/hour 126 tons/year		4. Synthetically Limited? <input checked="" type="checkbox"/>	
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: 0.5 lb/MMBtu		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: 28.6 lb/hour 85.7 tons/year	4. Synthetically Limited? [<input checked="" type="checkbox"/>]
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 _____ to _____ tons/year	
6. Emission Factor: 0.34 lb/MMBtu Reference: FLL 403.08725(2)(f)1.b.	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 1 of 1

1. Basis for Allowable Emissions Code: OTHER	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: 0.34 lb/MMBtu	4. Equivalent Allowable Emissions: 28.6 lb/hour 85.7 tons/year
5. Method of Compliance (limit to 60 characters): EPA Method 7E	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): Based on nitrogen oxide emission for citrus peel dryers in FLL 403.08725(2)(f)1.b.	

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: 1,522.3 lb/hour		4. Synthetically Limited? [<input checked="" type="checkbox"/>]	
		2,906.3 tons/year	
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 _____ to _____ tons/year			
6. Emission Factor: 82.51 lb/ton BDP		7. Emissions Method Code:	
Reference: See Att. SG-EU1-G8		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: 951.4 lb/hour 1,816.5 tons/year		4. Synthetically Limited? [<input checked="" type="checkbox"/>]	
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 _____ to _____ tons/year			
6. Emission Factor: 51.57 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: [<input checked="" type="checkbox"/>] Rule [<input type="checkbox"/>] 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. and FLL 403.08725(2)(g)1.	

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:	[<input type="checkbox"/>] Rule [<input checked="" type="checkbox"/>] 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: <u>SG-EU1-J1</u> [] Not Applicable [] Waiver Requested
2. Fuel Analysis or Specification [X] Attached, Document ID: <u>SG-EU1-J2</u> [] Not Applicable [] Waiver Requested
3. Detailed Description of Control Equipment [X] Attached, Document ID: <u>SG-EU1-J3</u> [] 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: <u>Attachment A</u> [] 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 <input type="checkbox"/> Attached, Document ID:_____ <input type="checkbox"/> Not Applicable
12. Alternative Modes of Operation (Emissions Trading) <input type="checkbox"/> Attached, Document ID:_____ <input type="checkbox"/> Not Applicable
13. Identification of Additional Applicable Requirements <input type="checkbox"/> Attached, Document ID:_____ <input type="checkbox"/> Not Applicable
14. Compliance Assurance Monitoring Plan <input type="checkbox"/> Attached, Document ID:_____ <input type="checkbox"/> Not Applicable
15. Acid Rain Part Application (Hard-copy Required) <input type="checkbox"/> Acid Rain Part - Phase II (Form No. 62-210.900(1)(a)) Attached, Document ID:_____ <input type="checkbox"/> Repowering Extension Plan (Form No. 62-210.900(1)(a)1.) Attached, Document ID:_____ <input type="checkbox"/> New Unit Exemption (Form No. 62-210.900(1)(a)2.) Attached, Document ID:_____ <input type="checkbox"/> Retired Unit Exemption (Form No. 62-210.900(1)(a)3.) Attached, Document ID:_____ <input type="checkbox"/> Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.) Attached, Document ID:_____ <input type="checkbox"/> Phase NOx Averaging Plan (Form No. 62-210.900(1)(a)5.) Attached, Document ID:_____ <input type="checkbox"/> Not Applicable

ATTACHMENT SG-EU1-B6
OPERATING CAPACITY/SCHEDULE COMMENT

ATTACHMENT SG-EU1-B6**Operating Capacity/Schedule Comment**

The 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.

**ATTACHMENT SG-EU1-G8
CALCULATION OF EMISSIONS**

Attachment SG-EU1-G8. Future Potential Emissions for New No. 2 Peel Dryer/WHE 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)	32.05 lb/hr	1	--	32.05	6,000 hr/yr	96.15
Particulate (PM ₁₀)	15 lb/hr	2	--	15	6,000 hr/yr	45.0
Sulfur dioxide	0.5 lb/MMBtu	3	84.0 MMBtu/hr	42.0	504,000 MMBtu/yr	126.0
Nitrogen oxides	0.34 lb/MMBtu	4	84.0 MMBtu/hr	28.6	504,000 MMBtu/yr	85.7
Carbon monoxide						
Early/Mids	58.05 lb/ton BDP	5	18.5 tons/hr BDP	1,071.1	--	--
Valencia	82.51 lb/ton BDP	5	18.5 tons/hr BDP	1,522.3	--	--
Annual Average	63.01 lb/ton BDP	5	--	--	92,250 tons/yr BDP	2,906.3
VOC						
Early/Mids	36.28 lb/ton BDP	6	18.5 tons/hr BDP	669.4	--	--
Valencia	51.57 lb/ton BDP	6	18.5 tons/hr BDP	951.4	--	--
Annual Average	39.38 lb/ton BDP	6	--	--	92,250 tons/yr BDP	1,816.5

Footnotes:

^a Proposed maximum heat input rate and throughput rate.

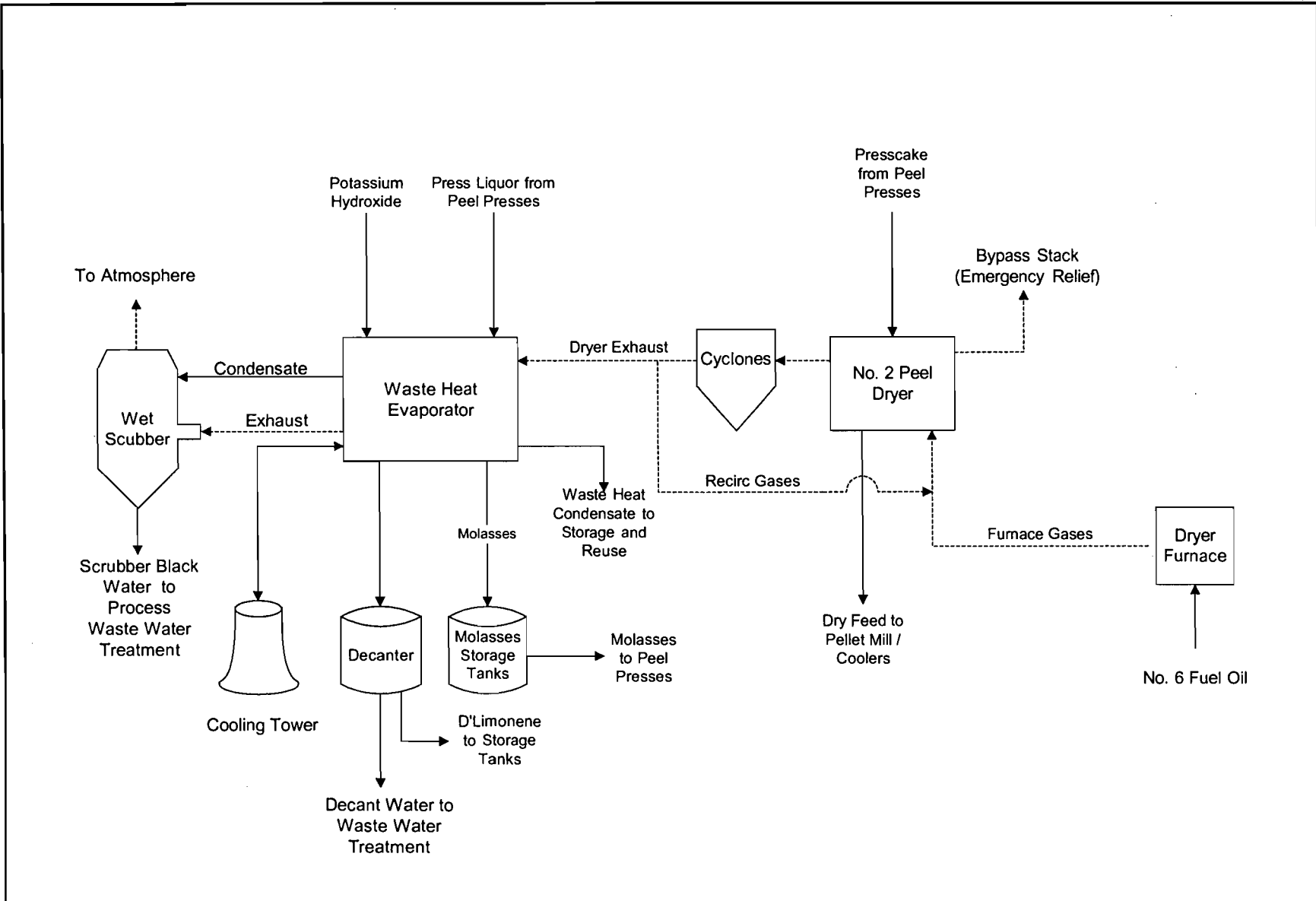
^b Based on 84 MMBtu/hr and 6,000 hours per year or 22.5 million boxes per year and 8.2 lb BDP/box.

BDP = bone dry peel

References:

1. Maximum emission rate based on Process Weight Formula, $E = 17.31E^{0.16}$, where E is in lb/hr and P = 47 TPY throughput rate [62-296.320(4)(a), F.A.C.].
2. Particulate matter (PM₁₀) emission factor for citrus peel dryers from FLL 403.08725(2)(e)1.
3. Based on emission limit of existing peel dryer/WHE. This dryer will be able to meet this limit since it will burn a fuel oil with a lower sulfur content than the existing peel dryer/WHE (fuel oil combustion is the primary source of SO₂ emissions from this emission unit).
4. Nitrogen oxide emission factors for sources that fire fuel oil from FLL 403.08725(2)(f)1.b.
5. Based on 160% of VOC emissions, derived from stack test data.
6. Emission factor based on General FCPA Emission Factor, maximum production rates and:
 Early/Mids -- 0.4275 lb oil/box and a hourly minimum of 50% oil recovery (51.67% overall oil recovered/juice/sewered).
 Valencia -- 0.6076 lb oil/box and a hourly minimum of 50% oil recovery (51.67% overall oil recovered/juice/sewered).
 Annual Average - assumes a 50/50 mix of Valencia and Early/Mids and an annual average of 55% oil recovery (56.67% overall oil recovered/juice/sewered).
 Based on 90 lb fruit/box; 8.2 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: No. 2 Peel Dryer/Waste Heat Evaporator
 Filename: SG-FIGS.VSD
 Latest Revision Date: 7/6/01

Process Flow Legend:	
Solid / Liquid	→
Gas	- - - - - →
Steam	- · - · - · →



ATTACHMENT SG-EU1-J2
FUEL ANALYSIS OR SPECIFICATION

ATTACHMENT SG-EU1-J2**Fuel Analysis Specification for Southern Gardens Citrus Processing Corporation
Peel Dryer/Waste Heat Evaporator**

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
Peel Dryer/Waste Heat Evaporator Wet Collection Control Equipment 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 similar equipment controlling emissions at the existing Citrus Feed Mill.

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

<p>1. Type of Emissions Unit Addressed in This Section: (Check one)</p> <p><input checked="" type="checkbox"/> 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).</p> <p><input type="checkbox"/> 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.</p> <p><input type="checkbox"/> 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.</p>			
<p>2. Regulated or Unregulated Emissions Unit? (Check one)</p> <p><input checked="" type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.</p> <p><input type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.</p>			
<p>3. Description of Emissions Unit Addressed in This Section (limit to 60 characters): No. 4 Pellet Cooler</p>			
<p>4. Emissions Unit Identification Number: ID:</p>			<p><input checked="" type="checkbox"/> No ID <input type="checkbox"/> ID Unknown</p>
<p>5. Emissions Unit Status Code: C</p>	<p>6. Initial Startup Date:</p>	<p>7. Emissions Unit Major Group SIC Code: 20</p>	<p>8. Acid Rain Unit? <input type="checkbox"/></p>
<p>9. Emissions Unit Comment: (Limit to 500 Characters) 4-Digit SIC code = 2037. This emissions unit consists of a new pellet mill and the No. 4 Pellet Cooler.</p>			

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

Emissions Unit Operating Capacity and Schedule

1. Maximum Heat Input Rate:		mmBtu/hr
2. Maximum Incineration Rate:	lb/hr	tons/day
3. Maximum Process or Throughput Rate:	46,000 lb/hr	
4. Maximum Production Rate:	46,000 lb/hr	
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):		
Maximum rates relate to total pounds of citrus peel.		

**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? CFM2		2. Emission Point Type Code: 1	
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:			
5. Discharge Type Code: V	6. Stack Height: 40 feet	7. Exit Diameter: 2 feet	
8. Exit Temperature: 110 °F	9. Actual Volumetric Flow Rate: 13,900 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): Exit stack of cyclone.			

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

Segment Description and Rate: Segment 1 of 1

1. Segment Description (Process/Fuel Type) (limit to 500 characters): Food and Agriculture, Feed Manufacture, Pellet Cooler		
2. Source Classification Code (SCC): 3-02-008-16		3. SCC Units: Tons Processed
4. Maximum Hourly Rate: 23	5. Maximum Annual Rate: 138,000	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit: 0
10. Segment Comment (limit to 200 characters): Hourly and annual rates refer to total dry citrus peel through cooler.		

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):		

**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: 5.0 lb/hour		4. Synthetically Limited? [<input checked="" type="checkbox"/>] 15.0 tons/year	
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 _____ to _____ tons/year			
6. Emission Factor: 5.0 lb/hr Reference: See Att. SG-EU2-G8		7. Emissions Method Code: 0	
8. Calculation of Emissions (limit to 600 characters): See Attachment SG-EU2-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 1 of 1

1. Basis for Allowable Emissions Code: OTHER		2. Future Effective Date of Allowable Emissions:	
3. Requested Allowable Emissions and Units: 5.0 lb/hr		4. Equivalent Allowable Emissions: 5.0 lb/hour 15.0 tons/year	
5. Method of Compliance (limit to 60 characters): VE < 5% opacity			
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): As per FLL 403.08725(3)(i)1., compliance tests are waived as long as compliance with visible emission limit is shown. Limit set forth in FLL 403.08725(2)(e)2.			

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

Potential/Fugitive Emissions

1. Pollutant Emitted: PM₁₀		2. Total Percent Efficiency of Control:	
3. Potential Emissions: 5.0 lb/hour 15.0 tons/year		4. Synthetically Limited? [<input checked="" type="checkbox"/>]	
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 _____ to _____ tons/year			
6. Emission Factor: 5.0 lb/hr Reference: FLL 403.08725(2)(e)2.		7. Emissions Method Code: 0	
8. Calculation of Emissions (limit to 600 characters): See Attachment SG-EU2-G8			
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): Proposed hours of operation are 6,000 hr/yr.			

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: 5.0 lb/hr		4. Equivalent Allowable Emissions: 5.0 lb/hour 15.0 tons/year	
5. Method of Compliance (limit to 60 characters): VE < 5% opacity			
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): As per FLL 403.08725(3)(i)1., compliance tests are waived as long as compliance with visible emission limit is shown. Limit set forth in FLL 403.08725(2)(e)2.			

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: 119.3 lb/hour	4. Synthetically Limited? <input checked="" type="checkbox"/> [X] 227.1 tons/year
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 _____ to _____ tons/year	
6. Emission Factor: 6.45 lb/ton BDP Reference: See Att. SG-EU2-G8	7. Emissions Method Code: 0
8. Calculation of Emissions (limit to 600 characters): See Attachment SG-EU2-G8	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): BDP = bone dry peel.	

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: VE05	2. Basis for Allowable Opacity: [] Rule [X] Other
3. Requested Allowable Opacity: Normal Conditions: 5 % 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): FLL 403.08725(2)(g)2.	

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

Continuous Monitoring System: Continuous Monitor _____ of _____

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	[] Rule [] 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):	

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

1. Process Flow Diagram [<input checked="" type="checkbox"/>] Attached, Document ID: <u>SG-EU2-J1</u> [] Not Applicable [] Waiver Requested
2. Fuel Analysis or Specification [] Attached, Document ID: _____ [<input checked="" type="checkbox"/>] Not Applicable [] Waiver Requested
3. Detailed Description of Control Equipment [] Attached, Document ID: _____ [<input checked="" type="checkbox"/>] Not Applicable [] Waiver Requested
4. Description of Stack Sampling Facilities [] Attached, Document ID: _____ [<input checked="" type="checkbox"/>] Not Applicable [] Waiver Requested
5. Compliance Test Report [] Attached, Document ID: _____ [] Previously submitted, Date: _____ [<input checked="" type="checkbox"/>] Not Applicable
6. Procedures for Startup and Shutdown [] Attached, Document ID: _____ [<input checked="" type="checkbox"/>] Not Applicable [] Waiver Requested
7. Operation and Maintenance Plan [] Attached, Document ID: _____ [<input checked="" type="checkbox"/>] Not Applicable [] Waiver Requested
8. Supplemental Information for Construction Permit Application [<input checked="" type="checkbox"/>] Attached, Document ID: <u>Attachment A</u> [] Not Applicable
9. Other Information Required by Rule or Statute [] Attached, Document ID: _____ [<input checked="" type="checkbox"/>] Not Applicable
10. Supplemental Requirements Comment:

Additional Supplemental Requirements for Title V Air Operation Permit Applications

11. Alternative Methods of Operation <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
12. Alternative Modes of Operation (Emissions Trading) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
13. Identification of Additional Applicable Requirements <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
14. Compliance Assurance Monitoring Plan <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
15. Acid Rain Part Application (Hard-copy Required) <input type="checkbox"/> Acid Rain Part - Phase II (Form No. 62-210.900(1)(a)) Attached, Document ID: _____ <input type="checkbox"/> Repowering Extension Plan (Form No. 62-210.900(1)(a)1.) Attached, Document ID: _____ <input type="checkbox"/> New Unit Exemption (Form No. 62-210.900(1)(a)2.) Attached, Document ID: _____ <input type="checkbox"/> Retired Unit Exemption (Form No. 62-210.900(1)(a)3.) Attached, Document ID: _____ <input type="checkbox"/> Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.) Attached, Document ID: _____ <input type="checkbox"/> Phase NOx Averaging Plan (Form No. 62-210.900(1)(a)5.) Attached, Document ID: _____ <input type="checkbox"/> Not Applicable

**ATTACHMENT SG-EU2-G8
CALCULATION OF EMISSIONS**

Attachment SG-EU2-G8. Future Potential Emissions for New No. 4 Pellet Cooler 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)	5.0 lb/hr	1	--	5.0	6,000 hr/yr	15.0
Particulate (PM ₁₀)	5.0 lb/hr	2	--	5.0	6,000 hr/yr	15.0
VOC						
Early/Mids	4.54 lb/ton BDP	3	18.5 TPH BDP	83.9	--	--
Valencia	6.45 lb/ton BDP	3	18.5 TPH BDP	119.3	--	--
Annual Average	4.92 lb/ton BDP	3	--	--	92,250 TPY BDP	227.1

Footnotes:

^a Based on maximum throughput rate.

^b Based on 22.5 million boxes of fruit per year, 8.2 lb bone dry peel per box and 6,000 hr/yr.

References:

1. Based on requested allowable emission rate.

2. Particulate matter (PM₁₀) limit for pellet coolers from FLL 403.08725(2)(e)2.

3. Emissions based on General FCPA Emission Factor, proposed maximum production rates and:

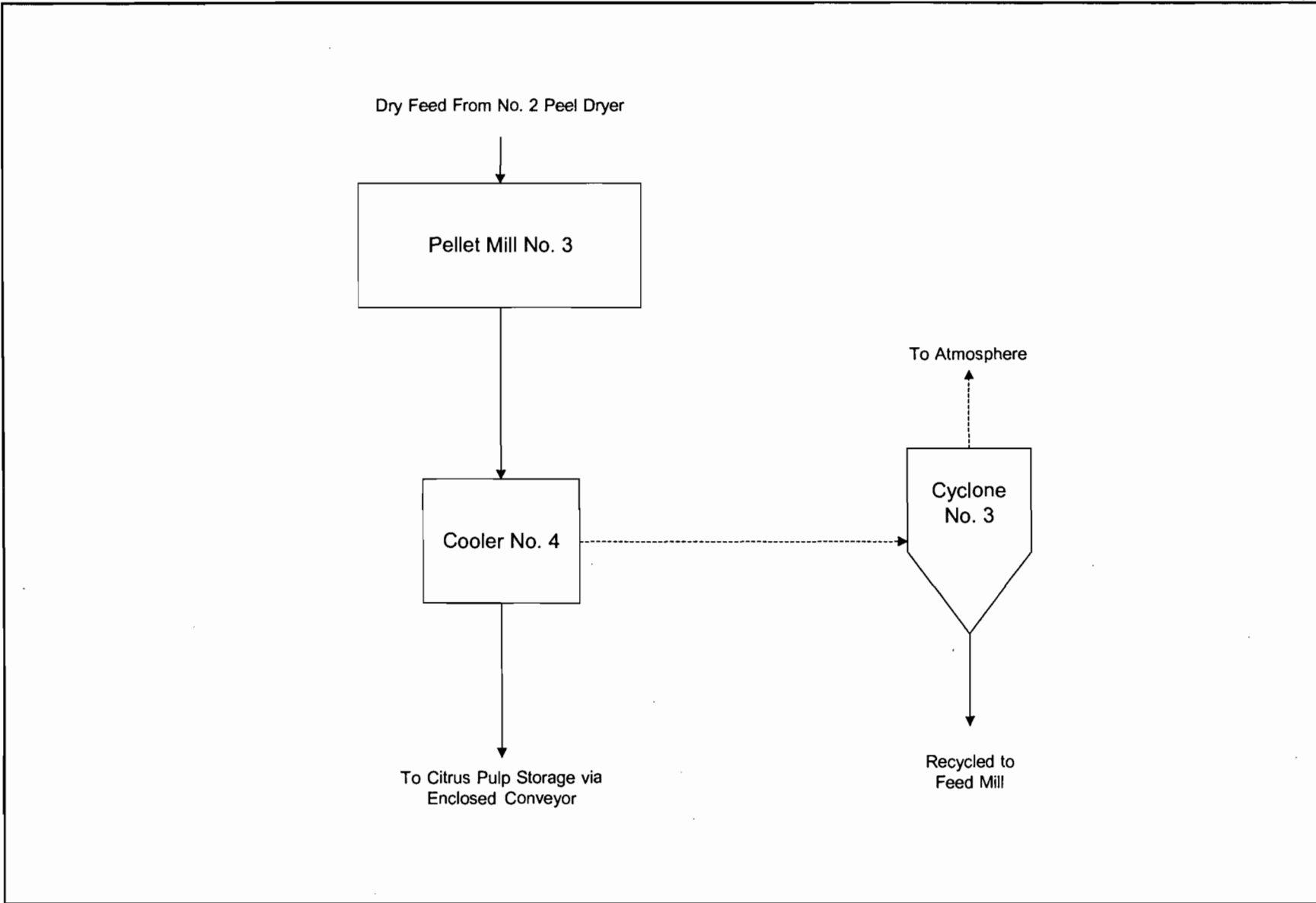
 Early/Mids -- 0.4275 lb oil/box and a hourly minimum of 50% oil recovery (51.67% overall oil recovered/juice/sewered).

 Valencia -- 0.6076 lb oil/box and a hourly minimum of 50% oil recovery (51.67% overall oil recovered/juice/sewered).

 Annual Average - assumes a 50/50 mix of Valencia and Early/Mids and an annual average of 55% oil recovery (56.67% overall oil recovered/juice/sewered).

 Based on 90 lb of fruit/box; 8.2 lb bone dry peel/box; 9% of oil to dryer emitted from pellet cooler.

**ATTACHMENT SG-EU2-J1
PROCESS FLOW DIAGRAM**



Attachment SG-EU2-J1
Southern Gardens Citrus Processing Corporation
Process Flow Diagram
Clewiston, Florida

Process Area: Pellet Mill No. 3/Cooler No. 4
Filename: SG-FIGS.VSD
Latest Revision Date: 7/6/01

Process Flow Legend:	
Solid / Liquid	→
Gas	- - - - ->
Steam	- · - · ->



ATTACHMENT A

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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 perform the following:

1. Increase the facility's maximum citrus fruit production capacity from 20 million boxes per year to 22.5 million boxes per year,
2. Install a used citrus peel dryer/waste heat evaporator, and
3. Install a pellet mill and pellet cooler to support the peel dryer operation.

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.

The SGCPC facility currently has a total of 39 citrus juice extractors, one citrus peel dryer/WHE, three pellet coolers, and four steam boilers. 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. However, due to increased demand, SGCPC is requesting that this facility production cap now be increased to 22.5 million boxes per year. The existing extractors are capable of accommodating this increased throughput on an annual basis.

SGCPC recently had an opportunity to purchase a used peel dryer/WHE at a favorable price from another citrus processing facility. SGCPC has purchased the used dryer/WHE, and now desires to bring it to the SGCPC plant site and install the dryer. The relocated peel dryer/WHE (identified as the No. 2 Peel Dryer/WHE) will be the same capacity as the existing peel dryer/WHE. Since the existing dryer/WHE is capable of accommodating the requested 22.5 million boxes per year facility production cap, the relocated No. 2 Peel Dryer/WHE would be used primarily as a backup unit at this time.

SGCPC is also proposing the addition of a new pellet mill and cooler to support the additional peel dryer. The new No. 4 Cooler will be similar to the existing No. 3 Cooler.

Note that SGCPC currently is exploring the possibility of further expanding the plant's production capacity, although there are no firm plans to expand at this time. Accordingly, SGCPC believes that it is appropriate to permit the proposed No. 2 Peel Dryer/WHE as a backup unit and to take a "synthetic minor" limit of 22.5 million boxes per year to avoid prevention of significant deterioration (PSD) review. Facility expansion would require additional juice extractors to be installed. If this occurs, the proposed dryer/WHE could no longer operate only as a backup -- both the existing and the proposed dryer/WHE would need to operate to process the peel that would be generated by the expanded plant. SGCPC recognizes that, if a facility expansion is undertaken and the limit of 22.5 million boxes per year is raised, the applicability of PSD to the proposed peel dryer/WHE would have to be evaluated as a "relaxation" under Rule 62-212.400(2)(g). SGCPC requests DEP's concurrence with this applicability analysis.

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.

This report contains a project description and a regulatory analysis for this project. The regulatory analysis addresses the requirements set forth in the citrus industry legislation. This legislation requires certain emission limits and sets a minimum citrus oil recovery level to be met upon startup of a new or modified citrus plant.

2.0 PROJECT DESCRIPTION

2.1 EXISTING OPERATIONS

The SGPC facility currently has a total of thirty-nine (39) citrus juice extractors, one citrus peel dryer/WHE, 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.

Currently, SGPC operates one 60,000 lb/hr (water evaporation rate) peel dryer that has a maximum heat input rate of 84.0 million British thermal units (MMBtu). The maximum bone dry peel (BDP) input rate 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. SGPC 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.

SGPC's pellet mill consists of two pellet mills and three pellet coolers (Cooler Nos. 1, 2, and 3). The maximum permitted process rate through the pellet mill is 23.0 TPH, total both mills. Cooler No. 3 operates alone, while Cooler Nos. 1 and 2 are used simultaneously for standby operation when Cooler No. 3 is shutdown for repair or maintenance. Cooler Nos. 1 and 3 utilize a common cyclone collector, while Cooler No. 2 has its own cyclone collector. The cyclones are considered as inherent control equipment since they are utilized to collect product. The total maximum operating hours of the pellet mill are 6,000 hr/yr.

Four steam boilers operate to supply steam to the juice processing equipment. The four boilers are rated at 33.6, 33.6, 35.6 and 6.3 MMBtu/hr, respectively, and all burn No. 2 fuel oil with a maximum sulfur content of 0.5 percent. Total fuel oil consumption for all boilers is limited to 4,078,000 gal/yr.

The seven VOL storage tanks consist of two No. 2 fuel oil tanks, two No. 6 fuel oil storage tanks, and three d-limonene storage tanks. The maximum permitted throughput rates through the tanks are 4,078,000 gal/yr, 7,100,863 gal/yr and 1,000,000 gal/yr, respectively.

2.2 PROPOSED CHANGES TO FACILITY

Due to increased demand for citrus fruit processing, SGPCPC is requesting that the current facility production cap of 20 million boxes per year be increased to 22.5 million boxes per year. The existing extractors are capable of accommodating this increased throughput on an annual basis. For the 2000-2001 processing, the facility will process over 19 million boxes of fruit. The requested higher production cap is achievable with existing equipment.

As discussed in Section 1.0, the existing dryer/WHE is capable of accommodating the requested 22.5 million boxes per year facility production cap, and therefore the proposed No. 2 Peel Dryer/WHE will be used primarily as a backup unit at this time. The proposed peel dryer 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. 2 fuel oil with a maximum sulfur content of 1.5 percent. The proposed WHE will have a maximum capacity of 135,000 lbs/hr water evaporation rate. The maximum peel production rate of the proposed dryer is 18.5 tons of bone dry peel (BDP) per hour. The dryer/WHE will operate for a maximum of 6,000 hours per year.

The proposed No. 3 Pellet Mill and No. 4 Pellet Cooler will operate whenever the No. 2 Peel dryer operates, i.e., primarily as a backup unit. The cooler will utilize its own cyclone collector for product collection. The maximum process rate of dried citrus pellets for the new pellet mill and pellet cooler is 23.0 TPH.

2.3 AIR EMISSIONS

The maximum emissions from the No. 2 Peel dryer/WHE and No. 4 Pellet Cooler are presented in Attachment SG-EU1-G8 and Attachment SG-EU2-G8, respectively. A summary of the annual emissions from the No. 2 Peel Dryer/WHE and No. 4 Pellet Cooler are presented in Table 2-1. Note that these emissions reflect all 22.5 million boxes of fruit per year being processed solely through the No. 2 Peel Dryer/WHE. These emissions would only occur if the No. 2 Peel Dryer processed all of the fruit received at the facility. In reality, the No. 2 Peel Dryer will be used primarily as a backup unit, and actual emission will be much less than those shown in Table 2-1.

SGCPC is requesting to increase the permitted facility production capacity to 22.5 million boxes of fruit per year. The future potential emissions from the SGCPC facility, reflective of 22.5 million boxes of fruit per year, are presented in Table 2-2. To further limit emissions of volatile organic compounds (VOC) and carbon monoxide (CO) from the facility, SGCPC will commit to a minimum future oil recovery of 56.67 percent. This includes 55 percent oil recovery from citrus oils, and 1.67 percent from oil remaining in juice and oil discharged to the sewer.

Since either the existing dryer or the proposed dryer can potentially process all of the peel resulting from 22.5 million boxes of fruit per year, the maximum facility emissions are based on the maximum annual emissions from either peel dryer. Future maximum emissions from the existing No. 1 Peel Dryer/WHE, based on 22.5 million boxes per year, are shown in Table 2-2. Tables 2-1 and 2-2 can be compared to determine the worst-case future annual emissions for the peel dryers for each pollutant.

The future maximum facility emissions based on processing 22.5 million boxes per year are presented in Table 2-3. The maximum emissions from either peel dryer (not both) were used in determining the maximum future facility emissions. Also, the emissions from Pellet Coolers No. 1 and 2, or Pellet Cooler No. 3, or Pellet Cooler No. 4 (not all together) were used in determining the future facility emissions (all the pellet coolers emit the same on a pounds of pollutant per ton of BDP basis). It is noted that although Table 2-3 includes the four process steam boilers, the increase in fruit production will not affect the annual permitted capacity of the steam boilers.

3.0 RULE APPLICABILITY

3.1 FLORIDA CITRUS INDUSTRY LEGISLATION

The citrus industry has been exempted from obtaining air pollution operation and construction permitting by the citrus industry legislation [FLL 403.0872(12)]. Instead of the typical permitting process, the legislation establishes certain emission limits and a minimum citrus oil recovery level that must be met upon startup of a new or modified citrus facility.

The citrus industry legislation establishes standards that all existing citrus juice processing facilities must comply with starting July 1, 2002, in lieu of current air construction and operating permits. These standards apply to facilities that have a fruit processing capacity of 2 million boxes per year or more. For the purpose of this legislation, "new sources" means emissions units constructed or added to a facility on or after July 1, 2000 and "existing sources" means emissions units constructed or modified before July 1, 2000. The following sections describe the requirements of this legislation and how it applies to this project.

3.1.1 EMISSION LIMITS

New or modified emission units must comply with this legislation upon startup. Existing sources have until October 31, 2002 to comply with the applicable requirements of the legislation.

The citrus industry legislation establishes limits for VOC, sulfur dioxide (SO₂), particulate matter of 10 microns or less (PM₁₀), nitrogen oxides (NO_x), and visible emissions (VE). VOC emissions are controlled by achieving a minimum of 50 percent recovery of oil from the citrus fruits processed. The oil recovery is required to be measured every operational day and averaged over the days of facility operation during a calendar year. SGCPC already complies with the 50 percent recovery oil requirement since it is a requirement of the existing PSD permit. SGCPC is proposing a minimum of 55 percent oil recovery on an annual basis for recovered citrus oils (equivalent to 56.67 percent total oil recovery, including oil remaining in juice and oil sent to sewer). One year after EPA's approval of the legislation, 65 percent of recovery of oil must be achieved.

SO₂ emissions are limited by sulfur content in fuel. Under this legislation, SGCPC can fire fuel oil with a maximum of 1.0 percent sulfur by weight since SGCPC does not have access to natural gas. SGCPC has until October 31, 2002 to comply with this requirement facility-wide, but the new dryer

must comply upon startup. In order to meet this requirement, SGPCPC is proposing to burn fuel oil with a maximum sulfur content of 1.5 percent in the new peel dryer, but will meet an SO₂ emissions limit of 0.5 lb/MMBtu, which is equivalent to burning 0.5 percent sulfur fuel oil. Therefore, this meets the intent of the legislation. Historic SO₂ emissions testing at SGPCPC has demonstrated that SO₂ removal occurs in the peel dryer/WHE system, and that a limit of 0.5 lb/MMBtu is achievable while burning 1.5 percent sulfur fuel oil.

As with the fuel sulfur content, SGPCPC will have until October 31, 2002 to comply with all of the PM₁₀ emission standards applicable to its facility for sources that have not been constructed or modified since July 1, 2000. PM₁₀ emissions have been established for the following sources at citrus processing facilities:

- Citrus peel dryer,
- Pellet cooler or cooling reel,
- Process steam boilers,
- Combustion turbine,
- Duct burner, and
- Glass plant furnace

The PM₁₀ emission standards of concern for this project are for the citrus peel dryer and the pellet cooler. The PM₁₀ emission standard for citrus peel dryers is 15 lb/hr. The standard for the pellet cooler is 5 lb/hr.

NO_x emission standards have also been established for all of above sources with the exception of the pellet cooler. A NO_x standard has not been established for citrus peel dryers that fire natural gas, propane, ethanol, biogas, or d-limonene. For citrus peel dryers that fire fuel oil, the standard is 0.34 pounds per MMBtu. The new citrus dryer at the SGPCPC facility will comply with the 0.34 pounds per MMBtu upon startup since it will fire No.6 fuel oil.

VE limits have been established for both citrus peel dryers and pellet coolers. The VE limit for the citrus peel dryer is 20 percent of opacity and the VE limit for the pellet cooler is 5 percent.

3.1.2 EMISSIONS DETERMINATIONS AND REPORTING

For all emissions for which SGPCPC is limited by the legislation, SGPCPC must determine the emissions for each calendar year and report to the Florida Department of Environmental Protection (FDEP) by April 1 of the following year. These emissions must be determined for each emissions unit by means of recordkeeping, test methods, averaging periods or other statistical conventions that meet the following requirements:

- Yield reliable data,
- Coincide with the emissions limit being measured,
- Represent the unit's performance; and
- Show the actual emissions of the unit.

Under the citrus legislation, SGPCPC is required to submit annual operating reports in accordance with FDEP's rules and annual and semiannual statements of compliance required under FDEP's Title V permitting rules. SGPCPC is also required to maintain all records that show compliance with the requirements of this legislation for five years.

Emission units subject to emission limiting standards for PM₁₀, NO_x, and VE are required to test emissions annually. PM emissions must be tested with Environmental Protection Agency (EPA) Method 5, provided that all PM emissions are assumed to PM₁₀. Under this legislation, SGPCPC will not have to test the PM emissions from the pellet cooler as long as compliance with the applicable VE limit is demonstrated. If the pellet cooler does not comply with the VE standard, a Method 5 test will need to be conducted within 30 days after the visible emissions test. Tests for VE must be conducted using EPA Method 9. Tests for NO_x emissions will be conducted using EPA Method 7E.

Sulfur content of fuel oil must be measured using the latest American Society for Testing and Materials methods suitable for determining sulfur content of fuel oil. SO₂ emissions are determined by using a mass balance using the sulfur content and the amount of fuel fired in the citrus peel dryer. The conversion of 2 pounds of SO₂ emitted for each pound of sulfur in the fuel fired will be used in the mass balance. In SGPCPC's case, compliance is proposed to be demonstrated by performing an annual SO₂ compliance test on the peel dryer/WHE stack.

SGPCPC will continue to be subject to emission fees under FDEP's Title V program. Commencing July 1, 2002, the allowable annual emissions for fee purposes will be computed as the emission limits

established in the legislation multiplied by the actual operation rates, heat input and hours of operation of each source for the previous operating year. If adequate records of actual heat input and operation rates are not maintained, it will be assumed that the source operated at its maximum capacity during hours of operation. If the hours of operation were not documented, it will be assumed that the source operated January 1 through May 31 and October 1 through December 31 of the previous operating year. The annual emissions fee shall be due and payable April 1 for the preceding calendar year.

3.2 PSD APPLICABILITY

Although PSD review for the proposed project is not required under the citrus industry legislation, an analysis is presented herein in the event that EPA ultimately disapproves of the legislation, and retroactive PSD review is required. The proposed project potentially affects all emitting units at the SGPC facility since the annual amount of fruit processed will increase.

SGPC received a PSD permit in December of 2000 for the addition of three citrus extractors to the facility. PSD review was triggered for PM, PM₁₀, SO₂, NO_x, CO, and VOC. Because the PSD permit was issued just recently, there is no historical two-year operating period which is representative of normal operations under the new PSD permit. In such cases, DEP rules provide that potential emissions shall equal actual emissions [Rule 62-210.200(12)(c), F.A.C.]. Therefore, the potential emissions reflected in the PSD permit constitute the baseline emissions for determining future PSD applicability.

The future potential emissions of the facility based on 22.5 million boxes/yr of fruit are compared to the PSD baseline emissions in Table 3-1. As shown, the proposed project will result in an increase in emissions of NO_x, CO, and VOC. However, all emission increases are below the PSD significant emission rates, as shown in Table 3-1. As a result, PSD review would not apply to the proposed project.

As described in Section 1.10, SGPC currently is exploring the possibility of further expanding the plant's production capacity, although there are no firm plans to expand at this time. Accordingly, SGPC believes that it is appropriate to permit the proposed No. 2 Peel Dryer/WHE as a backup unit and to take a "synthetic minor" limit of 22.5 million boxes per year to avoid prevention of significant deterioration (PSD) review. Facility expansion would require additional juice extractors to be

installed. If this occurs, the No. 2 Peel Dryer/WHE could no longer operate only as a backup -- both the existing and the proposed peel dryer/WHE would need to operate to process the peel that would be generated by the expanded plant. SGPCPC recognizes that, if a facility expansion is undertaken and the limit of 22.5 million boxes per year is raised, the applicability of PSD to the No. 2 Peel Dryer/WHE would have to be evaluated as a "relaxation" under Rule 62-212.400(2)(g). This rule addresses relaxations in permitted capacity under the PSD regulations:

(g) Relaxations of Restrictions on Pollutant Emitting Capacity. If a previously permitted facility or modification becomes a facility or modification which would be subject to the preconstruction review requirements of this rule if it were a proposed new facility or modification solely by virtue of a relaxation in any federally enforceable limitation on the capacity of the facility or modification to emit a pollutant (such as a restriction on hours of operation), which limitation was established after August 7, 1980, then at the time of such relaxation the preconstruction review requirements of this rule shall apply to the facility or modification as though construction had not yet commenced on it.

Although this rule is not relevant to the current proposal, it could be at the time SGPCPC further expands the facility. SGPCPC requests DEP's concurrence with this applicability analysis.

3.3 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.

SGPCPC is proposing to relocate an existing citrus peel dryer/WHE 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/WHE. 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 SGCPC 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.

Table 2-1. Summary of Annual Emissions from No. 2 Peel Dryer/WHE and
No. 4 Pellet Cooler, Southern Gardens

Regulated Pollutant	Annual Emissions (TPY)		Total Emissions (TPY)
	No. 2 Dryer/WHE	No. 4 Pellet Cooler	
Particulate (PM)	96.2	15.0	111.2
Particulate (PM ₁₀)	45.0	15.0	60.0
Sulfur Dioxide	126.0	--	126.0
Nitrogen Oxides	85.7	--	85.7
Carbon Monoxide	2,906.3	--	2,906.3
Volatile Organic Compounds	1,816.5	227.1	2,043.5

Table 2-2. Future Poential Emissions for Peel Dryer No. 1 with a Process Rate of 22.5 Million Boxes Per Year (55% Oil Recovery) ^a

Regulated Pollutant	Emission Factor	Reference	Short-Term Activity Factor ^a	Maximum Hourly Emissions (lb/hr)	Annual Activity Factor ^b	Annual Emissions (TPY)
Particulate (PM)	32.05 lb/hr	1	--	32.05	6,000 hr/yr	96.15
Particulate (PM ₁₀)	100% of PM	2	--	32.05	6,000 hr/yr	96.15
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	27.7	92,250 tons/yr BDP	69.2
Carbon monoxide						
Early/Mids	58.05 lb/ton BDP	5	18.5 tons/hr BDP	1,071.1	--	--
Valencia	82.51 lb/ton BDP	5	18.5 tons/hr BDP	1,522.3	--	--
Annual Average	63.01 lb/ton BDP	5	--	--	92,250 tons/yr BDP	2,906.3
VOC						
Early/Mids	36.28 lb/ton BDP	6	18.5 tons/hr BDP	669.4	--	--
Valencia	51.57 lb/ton BDP	6	18.5 tons/hr BDP	951.4	--	--
Annual Average	39.38 lb/ton BDP	6	--	--	92,250 tons/yr BDP	1,816.5

Footnotes:

^a Proposed throughput rate and maximum heat input rate.

^b Based on 84 MMBtu/hr and 6,000 hours per year or 22.5 million boxes per year and 8.2 lb BDP/box.

BDP = bone dry peel

References:

1. Maximum emission rate based on Process Weight Formula, $E = 17.31E^{0.16}$, where E is in lb/hr and P = 47 TPY throughput rate [62-296.320(4)(a), F.A.C.].
2. Conservative assumption.
3. Permitted emission limit.
4. Maximum emissions based on stack test data.
5. Based on 160% of VOC emissions, derived from stack test data.
6. Emission factor based on General FCPA Emission Factor, maximum production rates and:
 Early/Mids -- 0.4275 lb oil/box and a hourly minimum of 50% oil recovery (51.67% overall oil recovered/juice/sewered).
 Valencia -- 0.6076 lb oil/box and a hourly minimum of 50% oil recovery (51.67% overall oil recovered/juice/sewered).
 Annual Average - assumes a 50/50 mix of Valencia and Early/Mids and an annual average of 55% oil recovery (56.67 overall oil recovered/juice/sewered).
 Based on 90 lb fruit/box; 8.2 lb BDP/box; 72% of oil to dryer emitted from dryer stack.

Table 2-3. Future Potential Emissions for Southern Gardens Citrus Processing Corporation with a Process Rate of 22.5 Million Boxes Per Year (55% Oil Recovery) ^a

Regulated Pollutant	Future Potential Emissions (TPY)					Total Future Emissions (TPY)
	Peel Dryer No. 1	Peel Dryer No. 2	Maximum of Peel Dryers	Pellet Cooler Nos. 1-4	Boiler ^b Nos. 1-4	
Particulate (PM)	96.2	96.2	96.2	15.0	4.1	115.3
Particulate (PM ₁₀)	96.2	45.0	96.2	15.0	2.0	113.2
Sulfur dioxide	126.0	126.0	126.0	--	140.7	266.7
Nitrogen oxides	69.2	85.7	85.7	--	40.8	126.5
Carbon monoxide	2,906.3	2,906.3	2,906.3	--	10.2	2,916.5
VOC	1,816.5	1,816.5	1,816.5	226.9	1.0	2,044.4

Footnotes:

^a The 55% oil recovery reflects actual recovered oils only (cold press oil, d-limonene, and oil phase essence). Overall oil recovery, including oil remaining in juice and oil sent to sewer, is 56.67%.

^b Based on emissions presented in PSD application for extractor additions submitted to FDEP 9/00.

Table 3-1. Net Emission Increases for Southern Gardens Citrus Processing Corporation

Pollutant	Total Future Emissions (TPY)	Baseline ^a (TPY)	Net Change (TPY)	PSD Significant Emission Rate (TPY)	PSD Review Applies?
Particulate (PM)	115.3	115.3	0	25	No
Particulate (PM ₁₀)	113.2	113.2	0	15	No
Sulfur dioxide	266.7	266.7	0	40	No
Nitrogen oxides	126.5	102.3	24	40	No
Carbon monoxide	2,916.5	2,892	25	100	No
VOC	2,044.4	2,026	18	40	No

Footnotes:

^a Baseline emissions are based on future maximum emissions from the PSD application for the new juice extractors (9/00).