

Golder Associates Inc.

6241 NW 23rd Street, Suite 500
Gainesville, FL 32653-1500
Telephone (352) 336-5600
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MAY 15 2002

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May 9, 2002

Ms. Cindy Phillips, P.E.
FDEP Bureau of Air Regulation
MS 5505
2600 Blair Stone Road
Tallahassee, FL 32399-2400

BUREAU OF AIR REGULATION

RE: CLEAN AIR ACT SECTION 112(j) NOTIFICATION INFORMATION
CARGILL CITRO PURE L.P., AVON PARK FACILITY
TITLE V PERMIT NO. 0550035-003-AV

SD

Dear Ms. Phillips:

On behalf of Cargill Citro Pure, L.P., Golder Associates Inc. is providing the information necessary to satisfy the provisions of Section 112(j) of the Clean Air Act as amended in 1990, which pertains to the development of Maximum Achievable Control Technology (MACT) standards. Final regulations that revised the Section 112(j) rules were promulgated by the U. S. Environmental Protection Agency (EPA) on April 5, 2002. The final regulations affect owners or operators of a major source of hazardous air pollutants (HAPs) that include one or more sources in a category or subcategory for which EPA has failed to promulgate an emission standard before the applicable 112(j) deadline. According to Section 63.52(a)(1) of Title 40 of the Code of Federal Regulations (40 CFR), such owners or operators must submit a Part 1 application by May 15, 2002. The following information must be contained in the Part 1 application [40 CFR 63.53(a)]:

1. The name, address (physical location), and brief description of the major source (facility);
2. An identification of the relevant industry type source category(ies);
3. A list of the emission units belonging to the relevant industry type source category(ies); and
4. An identification of any affected sources for which a Section 112(g) MACT determination has been made.

The required information for each item is provided below:

1. **Name:** Cargill Citro Pure, L.P., Avon Park Facility
Address: 1552 Sun Pure Road, Avon Park, Florida 33825
Source Description: The existing facility is a citrus processing plant. This facility produces various citrus products and animal feed. The citrus processing plant consists of various process equipment including fruit washers, oil and juice extraction and evaporation equipment, fruit and peel conveyance equipment, a feedmill, two boilers, and cooling towers. The feedmill consists of a citrus peel dryer, a pellet mill, a pellet cooler, and a pellet warehouse.
2. **Relevant Industry Type Source Categories:** Depending on the applicability of the final MACT standards for individual source categories, the following source category may be applicable to sources at the facility:
 - Industrial, Commercial, and Industrial Boilers and Indirect-fired Process Heaters

3. List of the Emission Units Belonging to the Relevant Industry Type Source Categories:
This list is dependent on the applicability of the final MACT standard for each category.

Facility Emission Source	Emission Unit ID	Potentially Relevant Industry Type Source Category
Peel Dryer/Waste Heat Evaporator*	001	Industrial, Commercial, and Industrial Boilers and Indirect-fired Process Heaters
Boiler No. 1	003	Industrial, Commercial, and Industrial Boilers and Indirect-fired Process Heaters
Boiler No. 2	004	Industrial, Commercial, and Industrial Boilers and Indirect-fired Process Heaters

*The peel dryer is a direct-fired process heater and will not be covered under the source category. The peel dryer exhaust gases pass through the waste heat evaporator, which may be defined as an indirect-fired process heater. However, it is not clear at this time if the dryer will be regulated under MACT standards.

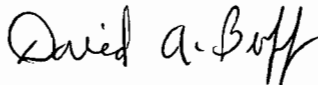
4. Previous Section 112(g) MACT Determinations: There have been no previous determinations for sources at the facility under Section 112(g).

Based on the information available to us at the time of this application, Cargill Citro Pure believes that the sources identified above may be subject to Section 112(j) of the Clean Air Act. We reserve the right, however, to amend or withdraw this application should we obtain new or different information regarding our status.

Attached is the Responsible Official's signature form. If you have any questions concerning the information provided, please contact Mr. Larry Hadden, Environmental Manager, at (863) 635-8057.

Sincerely,

GOLDER ASSOCIATES INC.



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

DB/SLW/jkw

Enclosure

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Owner/Authorized Representative or Responsible Official

1. Name and Title of Owner/Authorized Representative or Responsible Official: Bryce Kelly, General Operations Manager
2. Owner/Authorized Representative or Responsible Official Mailing Address: Organization/Firm: Cargill Citro Pure, L.P. Street Address: 100 East 6th Street City: Frostproof State: Florida Zip Code: 33843
3. Owner/Authorized Representative or Responsible Official Telephone Numbers: Telephone: (863) 635 - 8142 Fax: (863) 635 - 8040
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 [X], 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: <u><i>Bryce Kelly</i></u> Date: <u>5/13/02</u>

* 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
3. Professional Engineer Telephone Numbers: Telephone: (352) 336 - 5600 Fax: (352) 336 - 6603



Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

May 23, 2002

Mr. David A. Buff, P.E., Q.E.P.
Principal Engineer
Golder Associates Inc.
6241 NW 23rd Street, Suite 500
Gainesville, FL 32653-1500

Re: 112(j) Notification Information Submittal
Cargill Citro Pure, L.P., Avon Park Facility
Facility ID 0550035

Dear Mr. Buff:

Thank you for submitting the referenced information in your letter received May 15, 2002. The information submittal appears to meet our current 112(j) requirements.

Please be aware that, although your letter refers to a "Part 1 application," and the "Owner/Authorized Representative or Responsible Official" signature page from DEP Form No. 62-210.900(1) is used, the Department does not recognize this submittal as a state permit application and has no plans to process it as such.

No further 112(j) information is needed from you at this time.

If you have any questions, please call me at 850/921-9534.

Sincerely,

A handwritten signature in black ink that reads "Cindy L. Phillips".

Cindy L. Phillips, P.E.
Bureau of Air Regulation

"More Protection, Less Process"

Printed on recycled paper.