

Department of Environmental Protection

Jeb Bush
Governor

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

David B. Struhs
Secretary

April 20, 2001

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Paul Ballentine, Plant Manager
Louis Dreyfus Citrus, Inc.
PO Box 770399
Winter Garden, Florida 34777-0399

Re: DEP File No. 0950053-007-AC, Modification of Permit No. 0950053-005-AC
Revision of VOC Emission Limits and Pressed Peel Throughput Limits, Peel Dryers 6 & 7

The applicant, Louis Dreyfus Citrus, Inc., applied on June 14, 2000, to the Department for a modification to air construction permit number 0950053-005-AC for its existing citrus juice processing facility located at 355 Ninth Street, Winter Garden, Orange County. The modification is to provide for a revision to the emission limits for VOC from the two existing citrus peel dryers number 6 and 7, and a revision to the pressed peel throughput limitation on the dryers. The Department has reviewed the modification request. The referenced permit is hereby modified as follows:

Specific Condition 1.a shall be revised to read as follows:

1. Peel dryers no. 6 and 7 are permitted to operate at a combined rate of:
 - a. ~~71,659~~ 50,000 tons of bone dry peel per consecutive twelve months;

The VOC limits applicable to peel dryers 6 and 7 of Specific Condition 9 shall be revised to read as follows (the remainder of the table is unchanged and is not shown):

9. The following emissions limitations apply to the emissions units:

Dryer No. 6 & No. 7	Each Unit Lb/ton bone dry peel	Each Unit Lb/hr	Combined TPY
VOCs (expressed as propane)	18.2	175.3 250	457 455

[Note: The TPY limit for VOCs is derived from the limit for lb/ton BDP multiplied by the production limit of bone dry peel per consecutive twelve months.]

The existing paragraph of Specific Condition 19 shall be numbered "a." and an additional paragraph shall be added to this condition to read as follows:

- b. In addition to the requirements of paragraph a. above, compliance with the peel throughput limit of specific condition 1.a. shall be demonstrated by maintaining a daily log of pellet production that includes the weight and moisture content of pellets produced each day. The daily log shall be used to calculate the bone dry peel production for each calendar month and for the rolling 12 month total.

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

Any party to this order (permit modification) has the right to seek judicial review of it under Section 120.68, F.S., 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

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Printed on recycled paper.

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 permit modification was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 4/24/01 to the person(s) listed:

Mr. Paul Ballentine *
Mr. John B. Koogler, Ph.D., P.E.
Mr. Len Kozlov, P.E., DEP CD
Ms. Marie Driscoll, Orange County EPD

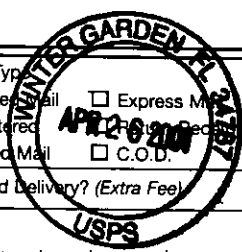
Clerk Stamp

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

Charlatti J. Hayes
(Clerk)

4/24/01
(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)	B. Date of Delivery
	C. Signature X <i>H Leach</i> <input type="checkbox"/> Agent <input type="checkbox"/> Addressee	
1. Article Addressed to: Mr. Paul Ballentine Plant Manager Louis Dreyfus Citrus, Inc. PO Box 770399 Winter Garden, FL 34777-0399	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) 7099 3400 0000 1450 2705	3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Insured Mail <input type="checkbox"/> Registered for Merchandise <input type="checkbox"/> C.O.D.	
PS Form 3811, July 1999	Domestic Return Receipt	102595-00-M-0952



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

Article Sent To:
Paul Ballentine

Louis Dreyfus Citrus

Postmark Here

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

Name (Please Print Clearly) (to be completed by mailer)
Paul Ballentine
Street, Apt. No., or PO Box No.

7099 3400 0000 1450 2705

102595-99-M-2087

PS Form 3800 July 1999 (Reverse)

TECHNICAL EVALUATION AND DETERMINATION

1 APPLICANT NAME AND ADDRESS

Louis Dreyfus Citrus, Inc.
PO Box 770399
Winter Garden, Florida 34777-0399

Authorized Representative: Paul Ballentine, Plant Manager

2 FACILITY DESCRIPTION, PROJECT DETAILS AND RULE APPLICABILITY

The facility is an existing citrus juice processing facility. This permitting project is to provide for a revision to the emission limits for VOC from the two existing citrus peel dryers, and a revision to the pressed peel throughput limitation on the dryers. The applicant requested an increase in short term allowable VOC mass emissions, with a commensurate reduction in allowable throughput of peel, so that the net change is a decrease in allowable VOC emissions from the dryers of two tons per year, combined. The Department included an equivalent emission limitation in units of pounds per ton of bone dry peel throughput, to provide an enforceable mechanism to link mass emissions to throughput. The applicant did not seek any relaxation in currently enforceable conditions limiting heat input or process throughput through these emissions units.

Emissions units addressed by this permit are citrus peel dryers number 6 and 7, collectively considered to be emissions unit 014.

There are no emissions increases associated with this project.

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). At this facility potential emissions of PM/PM₁₀, NO_x, SO₂, CO and VOC exceed 100 TPY.

This facility is not within an industry included in the list of the 28 Major Facility Categories per Table 62-212.400-1 of Chapter 62-212, F.A.C. Because emissions are greater than 250 TPY for at least one criteria pollutant, the facility is also an existing Major Facility with respect to Rule 62-212.400, Prevention of Significant Deterioration (PSD). There will be no net increase in emissions of air pollutants as a result of this permit modification. Therefore the project is not subject to PSD requirements of Rule 62-212.400, F.A.C.

This permit modification allows for the revision in emission and throughput limits for the peel dryers as discussed above.

The current Title V permit shows that the applicant reported that this facility is not 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.

TECHNICAL EVALUATION AND DETERMINATION

4 EXCESS EMISSIONS

This permit does not change any authorization for excess emissions provided by other Department permits pursuant to Rule 62-210.700 F.A.C.

5 LIMITS AND COMPLIANCE REQUIREMENTS

The permit modification revises the current emission and throughput limits related to VOC emissions from the two existing peel dryers. The limits and additional compliance requirements are detailed in the permit modification. The throughput limitation for the two dryers combined is revised downward to 50,000 tons of bone dry peel per consecutive 12 month period. Compliance with the limit will be demonstrated by maintaining a daily log of pellet production that includes the weight and moisture content of pellets produced each day. The daily log will be used to calculate the bone dry peel production for each calendar month and for the rolling 12 month total. Emission limits for VOC emissions from the dryers are established as follows. Short term emissions of VOC from each dryer is limited to 250 pounds per hour, and 18.2 pounds per ton of bone dry peel throughput, expressed as propane. Compliance with both limits will be demonstrated by annual stack test on each dryer, using Method 25A, with optional simultaneous Method 18 to determine methane content. An annual limit of VOC emissions for both dryers combined is established at 455 tons per year, based on the limits of VOC emissions in pounds per ton of bone dry peel and the limit on peel throughput for the consecutive 12 month period.

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 (permit modification) to allow revision of the emission and throughput limits related to VOC emissions from the two existing peel dryers, subject to the terms and conditions of the draft permit.

7 FINAL DETERMINATION

The Department distributed a public notice package for this permitting project on March 16, 2001. The Public Notice of Intent to Issue was published in The West Orange Times on March 29, 2001

No comments were received by the Department from the public or the Orange County local program.

The final action of the Department is to issue the permit with no changes.

DETAILS OF THIS ANALYSIS MAY BE OBTAINED BY CONTACTING:

Joseph Kahn, P.E.
Department of Environmental Protection
Bureau of Air Regulation
Mail Station #5505
2600 Blair Stone Road
Tallahassee, Florida 32399-2400
Telephone: 850/488-0114

Florida Department of
Environmental Protection

Memorandum

TO: Howard L. Rhodes

THRU: Clair Fancy *CLF*
Al Linero

FROM: Joe Kahn *JK*

DATE: April 20, 2001

SUBJECT: Louis Dreyfus Citrus, Inc., Project 0950053-007-AC
Modification of Permit 0950053-005-AC

Attached for approval and signature is a modification of an existing permit for the Dreyfus citrus juice processing facility. This permitting project is to provide for a revision to the emission limits for VOC from the two existing citrus peel dryers, and a revision to the pressed peel throughput limitation on the dryers. The applicant requested an increase in short term allowable VOC mass emissions, with a commensurate reduction in allowable throughput of peel, so that the net change is a decrease in allowable VOC emissions from the dryers of two tons per year, for both dryers combined.

The public notice requirements have been met on March 29, 2001 by publishing in The West Orange Times.

I recommend your approval and signature.

Day 90 is July 3, 2001.

Attachments

/jk