

Department of Environmental Protection

Jeb Bush
Governor

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

David B. Struhs
Secretary

April 17, 2002

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. 0950053-008-AC, Modification of Permit No. 0950053-005-AC
Revision of Emission Limits and Pressed Peel Throughput Limits, Peel Dryers 6 & 7 and East/West Cooler(s)

The applicant, Louis Dreyfus Citrus, Inc., applied on December 17, 2001, 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 from the two existing citrus peel dryers number 6 and 7 and the two pellet coolers, and a revision to the pressed peel throughput limitation on the coolers. The Department has reviewed the modification request. The referenced permit is hereby modified as follows:

Specific Condition 2.a shall be revised to read as follows:

- 2. The East and West Coolers are permitted a maximum combined input of:
 - a. ~~71,659~~ 50,000 tons per consecutive twelve months of bone dry peel.

The limits applicable to peel dryers 6 and 7 and the East/West pellet coolers 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	Each Unit	Combined
	Lb/ton bone dry peel	Lb/hr	TPY
PM	1.4	13.4 19.6	35.6
PM ₁₀	0.9	7.8 11.8	21.4
CO	14.2	130.7 195	355
NO _x	1.3	12.4 18.5	33.7

East/West Pellet Cooler(s)	Each Unit	Each Unit	Combined
	Lb/ton bone dry peel	Lb/hr	TPY
PM	0.11	1.0 1.5	2.8
VOC	1.4	13.4 19.2	35

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.

HL Rhodes

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 4/22/02 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.

Barbara J. Griddy 4/22/02
(Clerk) (Date)

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. Paul Ballentine, Plant Manager
 Louis Dreyfus Citrus, Inc.
 P. O. Box 770399
 Winter Garden, FL 34777-0399

COMPLETE THIS SECTION ON DELIVERY

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

H LEACH

C. Signature

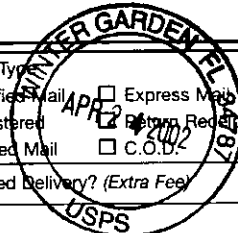
X H Leach

- 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 0600 0021 6524 3493

PS Form 3811, July 1999

Domestic Return Receipt

102595-00-M-0952

7000 0600 0021 6524 3493

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

Article Sent To:
 Mr. Paul Ballentine, Plant Manager

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. Paul Ballentine, Plant Manager
 Street, Apt. No., or PO Box No.
 P. O. Box 770399
 City, State, ZIP+4
 Winter Garden, Florida 34777-0399

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 from the two existing citrus peel dryers number 6 and 7 and the two pellet coolers, and a revision to the pressed peel throughput limitation on the coolers. The applicant requested an increase in short term allowable mass emissions, with a commensurate reduction in allowable throughput of peel, so that the net change is a zero. 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; the east pellet cooler identified as emissions unit 012; and, the west pellet cooler identified as emissions unit 006.

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 and pellet coolers 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.

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 emissions from the two existing peel dryers and the pellet coolers. The limits and additional compliance requirements are detailed in the permit modification. The throughput limitation for the two coolers 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. The methods of demonstration of compliance and testing frequency of the modified emissions limits will remain unchanged from those specified by air construction permit 0950053-005-AC

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 from the two existing peel dryers and pellet coolers, subject to the terms and conditions of the draft permit.

7 FINAL DETERMINATION

An "INTENT TO ISSUE AIR CONSTRUCTION PERMIT" to Louis Dreyfus Citrus for their existing citrus juice processing plant located at 355 Ninth Street, Winter Garden, Orange County was clerked on March 4, 2002. The "PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT" was published in the West Orange Times on March 21, 2002. The Draft Air Construction Permit was available for public inspection at the Central District office in Orlando 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 April 5, 2002.

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

Memorandum

**Florida Department of
Environmental Protection**

TO: Howard L. Rhodes
THRU: Clair H. Fancy
Scott Sheplak *gms*
FROM: Edward Svec *[Signature]*
DATE: April 17, 2002
SUBJECT: Louis Dreyfus Citrus, Inc.
Revision of Emission Limits and Output
DEP File No: 0950053-008-AC
Modification of 0950053-005-AC

*Issued, Howard out
4/18*

Attached for approval and signature is a final air construction permit revision to the emission limits from the two existing citrus peel dryers number 6 and 7 and the two pellet coolers, and a revision to the pressed peel throughput limitation on the coolers. The applicant did not seek any relaxation in currently enforceable conditions in its other existing emissions units.

No comments were received during the public comment period.

I recommend your approval and signature.

May 10, 2002 is day 90.

SMS/es
Attachments