

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 drivers 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

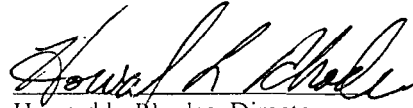
"More Protection, Less Process"

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Louis Dreyfus Citrus, Inc.
DEP File No. 0950053-007-AC
Modification of 0950053-005-AC
Page 2 of 2

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

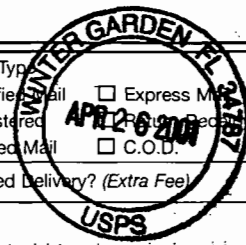
Clerk Stamp

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. 	<p>A. Received by (Please Print Clearly) _____ B. Date of Delivery _____</p>
<p>1. Article Addressed to:</p> <p>Mr. Paul Ballentine Plant Manager Louis Dreyfus Citrus, Inc. PO Box 770399 Winter Garden, FL 34777-0399</p>	<p>C. Signature X <i>H Leach</i> <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>
<p>2. Article Number (Copy from service label) 7099 3400 0000 1450 2705</p>	<p>3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Restricted Delivery for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p> <p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>
<p>PS Form 3811, July 1999 Domestic Return Receipt 102595-00-M-0952</p>	



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

Article Sent To:
Paul Ballentine Louis
Dreyful Citrus

Postage	\$	Postmark Here
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.

PS Form 3800, July 1999 (Reverse) 102595-99-M-2087

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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 
Al Linero

FROM: Joe Kahn 

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

YOUR AD APPEARED IN:

THE WEST ORANGE TIMES

DATE:

MAR. 29, 2001

**PUBLIC NOTICE OF INTENT
TO ISSUE AIR CONSTRUCTION
PERMIT MODIFICATION**

STATE OF FLORIDA

DEPARTMENT OF
ENVIRONMENTAL PROTECTION

DEP File No. 0950053-007-AC

Louis Dreyfus Citrus, Inc

Modification of Permit

No. 0950053-005-AC

Orange County

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit to Louis Dreyfus Citrus, Inc., 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 throughout limitation on the dryers. The applicant's mailing address is: PO Box 770399, Winter Garden, Florida 34777-0399. This modification will not result in an increase in emissions of air pollutants from the facility.

The Department will issue the final permit modification with its 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 the Public Notice of Intent to Issue Air Construction Permit Modification. 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 modification and require, if applicable, another Public Notice.

The Department will issue the final permit modification with its 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.

Mediation is not available in this proceeding.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, 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. 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 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.

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

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

Dept. of Environmental Protection Central District
3319 Maguire Boulevard, Suite 232, Orlando, Florida 32803-3767
Telephone: 407/894-7555

Air Program Section
Orange County Environmental Protection Department
800 Mercy Drive, Suite 4, Orlando, Florida 32808
Telephone: 407/836-1400

The complete project file includes the application, technical evaluations, draft permit modification, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Administration, New Source Review Section, or the Department's reviewing engineer for this project, Joseph Kohn, P.E., 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.

RECEIVED

APR 06 2001

BUREAU OF AIR REGULATION

**Louis Dreyfus Citrus**Louis Dreyfus Citrus Inc.
355 S. 9th St
34787-3651 Winter Garden FL
U.S.ATelephone (1 407) 656 1000
Fax (1 407) 656 4333**FAX TRANSMITTAL**

To <i>Al Liners</i>	From: <i>Paul Ballentine</i>
Company:	Date: <i>4/5/01</i>
Fax:	Pages: <i>including this page</i>
RE:	Cc:

Hard copy to follow

via Federal Express

Patty - Informed Joe on 4/17

assume we have hard copy by now.

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BEST AVAILABLE COPY

Insert Order Number 31006265

YOUR AD APPEARED IN:

THE WEST ORANGE TIMES

DATE: MAR. 29, 2001

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**PUBLIC NOTICE OF INTENT
TO ISSUE AIR CONSTRUCTION
PERMIT MODIFICATION**

**STATE OF FLORIDA
DEPARTMENT OF
ENVIRONMENTAL PROTECTION
DEP File No. 0950053-007-AC**

**Louis Dreyfus Citrus, Inc
Modification of Permit
No. 0950053-005-AC
Orange County**

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit to Louis Dreyfus Citrus, Inc., 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 throughout limitation on the dryers. The applicant's mailing address is: PO Box 770399, Winter Garden, Florida 34777-0399. This modification will not result in an increase in emissions of air pollutants from the facility.

The Department will issue the final permit modification with its 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 the Public Notice of Intent to Issue Air Construction Permit Modification. 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 modification and require, if applicable, another Public Notice.

The Department will issue the final permit modification with its conditions unless a timely petition for an administrative hearing is filed pursuant to sections 120.569 and 120.57 ES, before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below.

Mediation is not available in this proceeding.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, 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. 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



Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

RECEIVED
March 15, 2001
APR 06 2001

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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

BUREAU OF AIR REGULATION

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

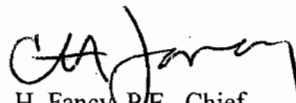
Dear Mr. Ballentine:

Enclosed is one copy of the draft air construction permit modification for the existing Louis Dreyfus facility located at 355 Ninth Street, Winter Garden, Orange County. The Technical Evaluation and Determination, the Department's Intent to Issue Air Construction Permit Modification and the Public Notice of Intent to Issue Air Construction Permit Modification are also included.

The Public Notice of Intent to Issue Air Construction Permit Modification 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 A. A. Linero, P.E., Administrator, New Source Review Section at the above letterhead address. If you have any other questions, please contact Joseph Kahn, P.E., at 850/921-9509 or Mr. Linero at 850/488-0114.

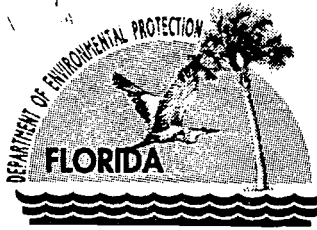
Sincerely,


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

CHF/jk

Enclosures

cc: J. Koylan, C. Dist



Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

March 15, 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

Dear Mr. Ballentine:

Enclosed is one copy of the draft air construction permit modification for the existing Louis Dreyfus facility located at 355 Ninth Street, Winter Garden, Orange County. The Technical Evaluation and Determination, the Department's Intent to Issue Air Construction Permit Modification and the Public Notice of Intent to Issue Air Construction Permit Modification are also included.

The Public Notice of Intent to Issue Air Construction Permit Modification 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 A. A. Linero, P.E., Administrator, New Source Review Section at the above letterhead address. If you have any other questions, please contact Joseph Kahn, P.E., at 850/921-9509 or Mr. Linero at 850/488-0114.

Sincerely,

A handwritten signature in black ink, appearing to read "C. H. Fancy".

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

CHF/jk

Enclosures

"More Protection, Less Process"

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Jeb Bush
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Department of Environmental Protection

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

David B. Struhs
Secretary

P.E. Certification Statement

Louis Dreyfus Citrus, Inc.

DEP File No.: 0950053-007-AC
Facility ID No.: 0950053

Project: Air Construction Permit Modification
Modification of 0950053-005-AC

I HEREBY CERTIFY that the engineering features described in the above referenced application and related additional information submittals, if any, 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).

This review was conducted by me.

(Seal)

Joseph Kahn, P.E.
Registration # 45268

3/14/01
Date

Permitting Authority:

Florida Department of Environmental Protection
Division of Air Resources Management
Bureau of Air Regulation
New Source Review Section
Mail Station #5505
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Telephone: 850/488-0114
Fax: 850/922-6979

"More Protection, Less Process"

Printed on recycled paper.

In the Matter of an
Application for Permit by:

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

DEP File No. 0950053-007-AC
Modification of Permit No. 0950053-005-AC
Orange County

INTENT TO ISSUE AIR CONSTRUCTION PERMIT MODIFICATION

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

The applicant applied on June 14, 2000, to the Department for an air construction permit modification 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 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 modification is required to address the applicant's request.

The Department intends to issue this air construction permit modification 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 Modification. 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 modification with its 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 modification and require, if applicable, another Public Notice.

The Department will issue the permit modification with its 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 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 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.

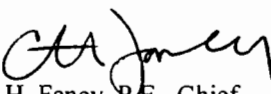
In addition to the above, a person subject to regulation has a right to apply for a variance from or waiver of the requirements of particular rules, on certain conditions, under Section 120.542 F.S. The relief provided by this state statute applies only to state rules, not statutes, and not to any federal 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.

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 Modification (including the Public Notice of Intent to Issue Air Construction Permit Modification, Technical Evaluation and Determination, and the draft permit modification) was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 3/16/01 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.


(Clerk) 3/16/01 (Date)

PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT MODIFICATION

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

DEP File No. 0950053-007-AC

Louis Dreyfus Citrus, Inc.
Modification of Permit No. 0950053-005-AC
Orange County

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit to Louis Dreyfus Citrus, Inc., 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 applicant's mailing address is: PO Box 770399, Winter Garden, Florida 34777-0399. This modification will not result in an increase in emissions of air pollutants from the facility.

The Department will issue the final permit modification with its 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 Modification. 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 modification and require, if applicable, another Public Notice.

The Department will issue the final permit modification with its 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.

Mediation is not available in this proceeding.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, 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.

NOTICE TO BE PUBLISHED IN THE NEWSPAPER

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

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
Central District
Suite 232, 3319 Maguire Boulevard
Orlando, Florida 32803-3767
Telephone: 407/894-7555

Air Program Section
Orange County Environmental
Protection Department
800 Mercy Drive, Suite 4
Orlando, Florida 32808
Telephone: 407/836-1400

The complete project file includes the application, technical evaluations, draft permit modification, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Administrator, New Source Review Section, or the Department's reviewing engineer for this project, Joseph Kahn, P.E., 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

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.

4 EXCESS EMISSIONS

TECHNICAL EVALUATION AND DETERMINATION

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.

9 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.

10 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:

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

^ DRAFT

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

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.

DRAFT

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 _____ 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.

(Clerk)

(Date)



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

Louis Dreyfus Citrus, Inc.

DEP File No.: 0950053-007-AC

Facility ID No.: 0950053

Project: Air Construction Permit Modification
Modification of 0950053-005-AC

I HEREBY CERTIFY that the engineering features described in the above referenced application and related additional information submittals, if any, 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).

This review was conducted by me.

(Seal)
REGISTERED ENGINEER
STATE OF FLORIDA
Joseph Kahn, P.E.
Registration # 45268
Date: 11/14/07

Permitting Authority:

Florida Department of Environmental Protection
Division of Air Resources Management
Bureau of Air Regulation
New Source Review Section
Mail Station #5505
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Telephone: 850/488-0114

Fax: 850/922-6979

"More Protection, Less Process"


Printed on recycled paper.

Memorandum

Florida Department of Environmental Protection

TO: Clair Fancy

THRU: Al Linero

FROM: Joe Kahn 

DATE: March 14, 2001

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

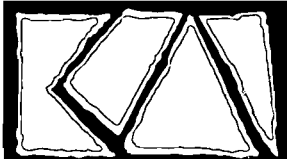
Attached for approval and signature is a modification of an existing permit for the Dreyfus citrus juice processing facility. This permitting project is to provide for a revision to the emission limits for VOC from the two existing citrus peel dryers, and a revision to the pressed peel throughput limitation 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, combined.

I recommend your approval and signature.

March 14, 2001 is day 12 of the 90 day timeclock.

Attachments

/jk



KOOGLER & ASSOCIATES
ENVIRONMENTAL SERVICES

4014 NW THIRTEENTH STREET
GAINESVILLE, FLORIDA 32609
352/377-5822 • FAX/377-7158

KA 118-00-03

February 28, 2001

RECEIVED

MAR - 2 2001

Bureau of Air Monitoring
& Mobile Sources

Mr. Joseph Kahn, P.E.
Florida Department of
Environmental Protection
Twin Towers Office Building
2600 Blair Stone Rd
Tallahassee, FL 32399-2400

Subject: Additional Information
Louis Dreyfus Citrus, Inc.
Permit No. 0950053-005-AC

Dear Mr. Kahn:

This is a follow up to your request for additional information on the pending permit revision request for the above referenced facility.

Enclosed are four copies of the permit application form (facility portion) with signatures of the Responsible Official (RO) and the Professional Engineer (PE) of record.

Also, to confirm your understanding, the test results previously submitted to FDEP as part of this request, indicate pounds of VOCs, measured as propane.

If you have any questions, please do not hesitate to call Pradeep Raval or me.

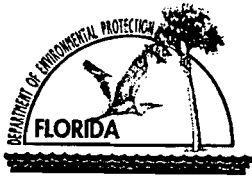
Very truly yours,

KOOGLER & ASSOCIATES

John B. Koogler, Ph.D., P.E.

JBK:par
Encl.

c: P. Ballentine, LDC
J. Koogler, CD



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: Louis Dreyfus Citrus, Inc.	
2. Site Name: Louis Dreyfus Citrus	
3. Facility Identification Number: 0950053 [] Unknown	
4. Facility Location: Street Address or Other Locator: 355 Ninth Street City: Winter Garden County: Orange Zip Code: 32787	
5. Relocatable Facility? [] Yes [X] No	6. Existing Permitted Facility? [X] Yes [] No

Application Contact

1. Name and Title of Application Contact: Pradeep Raval, Engineer	
2. Application Contact Mailing Address: Organization/Firm: Koogler & Associates Street Address: 4014 NW 13th Street City: Gainesville State: FL Zip Code: 32609	
3. Application Contact Telephone Numbers: Telephone: (352) 377-5822 Fax: (352) 377-7158	

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

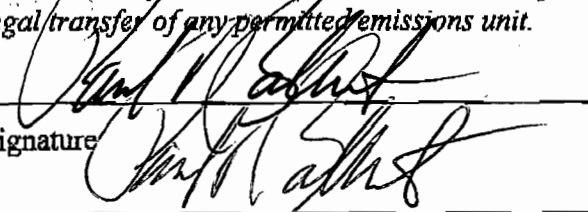
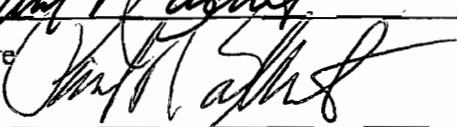
This Application for Air Permit is submitted to obtain: (Check one)

- 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.

Bureau of Air Monitoring & Mobile Sources

RECEIVED
MAR - 5 2001

Owner/Authorized Representative or Responsible Official

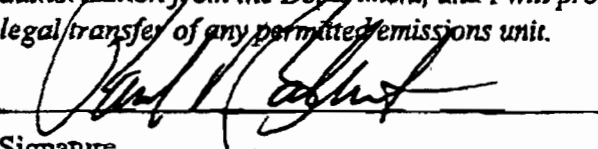
1. Name and Title of Owner/Authorized Representative or Responsible Official: Paul Ballentine, Plant Manager
2. Owner/Authorized Representative or Responsible Official Mailing Address: Organization/Firm: Louis Dreyfus Citrus, Inc. Street Address: P.O. Box 770399 City: Winter Garden State: FL Zip Code: 34777-0399
3. Owner/Authorized Representative or Responsible Official Telephone Numbers: Telephone: (407) 656-1000 Fax: (407) 656-1229
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:  Date: 2/28/01  2/28/01

* Attach letter of authorization if not currently on file.

Professional Engineer Certification

1. Professional Engineer Name: John B. Koogler, Ph.D., P.E. Registration Number: 12925
2. Professional Engineer Mailing Address: Organization/Firm: Koogler & Associates Street Address: 4014 NW 13th Street City: Gainesville State: FL Zip Code: 32609
3. Professional Engineer Telephone Numbers: Telephone: (352) 377 - 5822 Fax: (352) 377 - 7158

Owner/Authorized Representative or Responsible Official

1. Name and Title of Owner/Authorized Representative or Responsible Official: Paul Ballentine, Plant Manager
2. Owner/Authorized Representative or Responsible Official Mailing Address: Organization/Firm: Louis Dreyfus Citrus, Inc. Street Address: P.O. Box 770399 City: Winter Garden State: FL Zip Code: 34777-0399
3. Owner/Authorized Representative or Responsible Official Telephone Numbers: Telephone: (407) 656-1000 Fax: (407) 656-1229
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 _____ Date <u>2/28/01</u>

* Attach letter of authorization if not currently on file.

Professional Engineer Certification

1. Professional Engineer Name: John B. Koogler, Ph.D., P.E. Registration Number: 12925
2. Professional Engineer Mailing Address: Organization/Firm: Koogler & Associates Street Address: 4014 NW 13th Street City: Gainesville State: FL Zip Code: 32609
3. Professional Engineer Telephone Numbers: Telephone: (352) 377 - 5822 Fax: (352) 377 - 7158

4. Professional Engineer Statement:

I, the undersigned, hereby certify, except as particularly noted herein, that:*

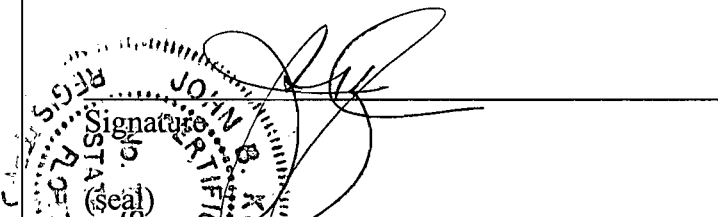
(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this Application for Air Permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions 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 2/22/01

* Attach any exception to certification statement.

Construction/Modification Information

1. Description of Proposed Project or Alterations:

Amend permit to reconcile dryer VOC emissions and peel processing rate.

2. Projected or Actual Date of Commencement of Construction: NA

3. Projected Date of Completion of Construction: NA

Application Comment

The information is submitted in the format discussed with FDEP.

II. FACILITY INFORMATION

A. GENERAL FACILITY INFORMATION

Facility Location and Type

1. Facility UTM Coordinates: Zone: 17 East (km): 443.80 North (km): 3159.50			
2. Facility Latitude/Longitude: Latitude (DD/MM/SS): 28/33/49 Longitude (DD/MM/SS): 81/34/27			
3. Governmental Facility Code: 0	4. Facility Status Code: A	5. Facility Major Group SIC Code: 20	6. Facility SIC(s): 2037
7. Facility Comment (limit to 500 characters): Citrus processing plant.			

Facility Contact

1. Name and Title of Facility Contact: Paul Ballentine, Plant Manager			
2. Facility Contact Mailing Address: Organization/Firm: Louis Dreyfus Citrus, Inc. Street Address: P.O. Box 770399 City: Winter Garden State: FL Zip Code: 34777-0399			
3. Facility Contact Telephone Numbers: Telephone: (407) 656 - 1000 Fax: (407) 656 - 1229			

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 type="checkbox"/> Major Source of Hazardous Air Pollutants (HAPs)?	
5. <input type="checkbox"/> Synthetic Minor Source of HAPs?	
6. <input 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):	

List of Applicable Regulations

FDEP CORE LIST	
FS 120, 403	
FAC 62-4, 204, 210, 213, 214, 252, 256, 257, 281, 296, 297.	
40 CFR 52, 55, 60, 63, 82.	

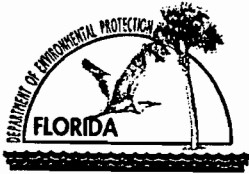
C. FACILITY SUPPLEMENTAL INFORMATION

Supplemental Requirements

1. Area Map Showing Facility Location: <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable <input checked="" type="checkbox"/> Waiver Requested
2. Facility Plot Plan: <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable <input checked="" type="checkbox"/> Waiver Requested
3. Process Flow Diagram(s): <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable <input checked="" type="checkbox"/> Waiver Requested
4. Precautions to Prevent Emissions of Unconfined Particulate Matter: <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable <input checked="" type="checkbox"/> Waiver Requested
5. Fugitive Emissions Identification: <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable <input checked="" type="checkbox"/> Waiver Requested
6. Supplemental Information for Construction Permit Application: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
7. Supplemental Requirements Comment: Information has been previously submitted to DEP.

Additional Supplemental Requirements for Title V Air Operation Permit Applications

8. List of Proposed Insignificant Activities: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" 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 checked="" type="checkbox"/> Not Applicable
10. Alternative Methods of Operation: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
11. Alternative Modes of Operation (Emissions Trading): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
12. Identification of Additional Applicable Requirements: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" 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 checked="" type="checkbox"/> Not Applicable
14. Compliance Report and Plan: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
15. Compliance Certification (Hard-copy Required): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable



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: Louis Dreyfus Citrus, Inc.	
2. Site Name: Louis Dreyfus Citrus	
3. Facility Identification Number: 0950053 [] Unknown	
4. Facility Location: Street Address or Other Locator: 355 Ninth Street City: Winter Garden County: Orange Zip Code: 32787	
5. Relocatable Facility? [] Yes [X] No	6. Existing Permitted Facility? [X] Yes [] No

Application Contact

1. Name and Title of Application Contact: Pradeep Raval, Engineer		
2. Application Contact Mailing Address: Organization/Firm: Koogler & Associates Street Address: 4014 NW 13th Street City: Gainesville State: FL Zip Code: 32609		
3. Application Contact Telephone Numbers: Telephone: (352) 377-5822 Fax: (352) 377-7158		

Application Processing Information (DEP Use)

1. Date of Receipt of Application:	
2. Permit Number:	
3. PSD Number (if applicable):	
4. Siting Number (if applicable):	

Duplicate
APP

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: _____

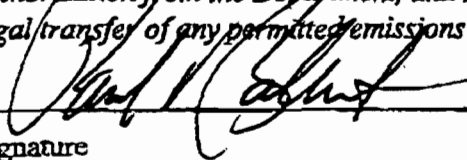
Reason for revision: _____

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: Paul Ballentine, Plant Manager
2. Owner/Authorized Representative or Responsible Official Mailing Address: Organization/Firm: Louis Dreyfus Citrus, Inc. Street Address: P.O. Box 770399 City: Winter Garden State: FL Zip Code: 34777-0399
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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 _____ Date 2/28/01

* Attach letter of authorization if not currently on file.

Professional Engineer Certification

1. Professional Engineer Name: John B. Koogler, Ph.D., P.E. Registration Number: 12925
2. Professional Engineer Mailing Address: Organization/Firm: Koogler & Associates Street Address: 4014 NW 13th Street City: Gainesville State: FL Zip Code: 32609
3. Professional Engineer Telephone Numbers: Telephone: (352) 377 - 5822 Fax: (352) 377 - 7158

4. Professional Engineer Statement:

I, the undersigned, hereby certify, except as particularly noted herein, that:*

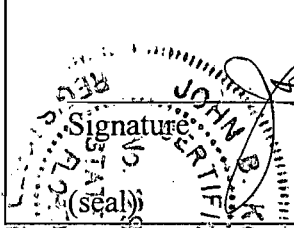
(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this Application for Air Permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions 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 _____

Date 2/28/01

* Attach any exception to certification statement.

Construction/Modification Information

1. Description of Proposed Project or Alterations:

Amend permit to reconcile dryer VOC emissions and peel processing rate.

2. Projected or Actual Date of Commencement of Construction: NA

3. Projected Date of Completion of Construction: NA

Application Comment

The information is submitted in the format discussed with FDEP.

II. FACILITY INFORMATION

A. GENERAL FACILITY INFORMATION

Facility Location and Type

1. Facility UTM Coordinates: Zone: 17 East (km): 443.80 North (km): 3159.50			
2. Facility Latitude/Longitude: Latitude (DD/MM/SS): 28/33/49 Longitude (DD/MM/SS): 81/34/27			
3. Governmental Facility Code: 0	4. Facility Status Code: A	5. Facility Major Group SIC Code: 20	6. Facility SIC(s): 2037
7. Facility Comment (limit to 500 characters): Citrus processing plant.			

Facility Contact

1. Name and Title of Facility Contact: Paul Ballentine, Plant Manager			
2. Facility Contact Mailing Address: Organization/Firm: Louis Dreyfus Citrus, Inc. Street Address: P.O. Box 770399 City: Winter Garden State: FL Zip Code: 34777-0399			
3. Facility Contact Telephone Numbers: Telephone: (407) 656 - 1000 Fax: (407) 656 - 1229			

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 type="checkbox"/> Major Source of Hazardous Air Pollutants (HAPs)?	
5. <input type="checkbox"/> Synthetic Minor Source of HAPs?	
6. <input 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):	

List of Applicable Regulations

FDEP CORE LIST	
FS 120, 403	
FAC 62-4, 204, 210, 213, 214, 252, 256, 257, 281, 296, 297.	
40 CFR 52, 55, 60, 63, 82.	

C. FACILITY SUPPLEMENTAL INFORMATION

Supplemental Requirements

1. Area Map Showing Facility Location: <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable <input checked="" type="checkbox"/> Waiver Requested
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3. Process Flow Diagram(s): <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable <input checked="" type="checkbox"/> Waiver Requested
4. Precautions to Prevent Emissions of Unconfined Particulate Matter: <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable <input checked="" type="checkbox"/> Waiver Requested
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Additional Supplemental Requirements for Title V Air Operation Permit Applications

8. List of Proposed Insignificant Activities: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" 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 checked="" type="checkbox"/> Not Applicable
10. Alternative Methods of Operation: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
11. Alternative Modes of Operation (Emissions Trading): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
12. Identification of Additional Applicable Requirements: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" 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 checked="" type="checkbox"/> Not Applicable
14. Compliance Report and Plan: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
15. Compliance Certification (Hard-copy Required): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable



KOGLER & ASSOCIATES
ENVIRONMENTAL SERVICES
4014 NW THIRTEENTH STREET
GAINESVILLE, FLORIDA 32609
352/377-5822 • FAX/377-7158

PROJECT 118-00-03

FAX TRANSMITTAL FORM

RECEIVED
FEB 28 2001
Bureau of Air Monitoring
& Mobile Sources

TO: Joe Kalm
FDER - Tallahassee

FAX NO. _____
FROM: Pradeep Kaval
DATE: 2/28/01 SENT BY: [Signature]

The text being transmitted consists of 12 page(s) PLUS this one. If you do not receive all of the pages or if there are difficulties with this transmission, please call (352) 377-5822.

REMARKS: Per your request. Originals
being sent by regular mail. Do
you need original of RO signature? I
only have the faxed copy. Let
me know. TX. [Signature]

This message is intended for use only by the individual to whom it has been addressed and may contain confidential or privileged information. If you are not the intended recipient, please note that the use, copying or distribution of this information is not permitted. If you have received this FAX in error, please destroy the original and notify the sender immediately at (352) 377-5822 so that we may prevent any recurrence. Thank you.



KOOGLER & ASSOCIATES
ENVIRONMENTAL SERVICES
4014 NW THIRTEENTH STREET
GAINESVILLE, FLORIDA 32609
352/377-5822 • FAX/377-7158

KA 118-00-03

February 28, 2001

Mr. Joseph Kahn, P.E.
Florida Department of
Environmental Protection
Twin Towers Office Building
2600 Blair Stone Rd
Tallahassee, FL 32399-2400

Subject: Additional Information
Louis Dreyfus Citrus, Inc.
Permit No. 0950053-005-AC

Dear Mr. Kahn:

This is a follow up to your request for additional information on the pending permit revision request for the above referenced facility.

Enclosed are four copies of the permit application form (facility portion) with signatures of the Responsible Official (RO) and the Professional Engineer (PE) of record.

Also, to confirm your understanding, the test results previously submitted to FDEP as part of this request, indicate pounds of VOCs, measured as propane.

If you have any questions, please do not hesitate to call Pradeep Raval or me.

Very truly yours,

KOOGLER & ASSOCIATES

John B. Koogler, Ph.D., P.E.

JBK:par
Encl.

c: P. Ballentine, LDC



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: Louis Dreyfus Citrus, Inc.	
2. Site Name: Louis Dreyfus Citrus	
3. Facility Identification Number: 0950053 [] Unknown	
4. Facility Location: Street Address or Other Locator: 355 Ninth Street City: Winter Garden County: Orange Zip Code: 32787	
5. Relocatable Facility? [] Yes [X] No	6. Existing Permitted Facility? [X] Yes [] No

Application Contact

1. Name and Title of Application Contact: Pradeep Raval, Engineer		
2. Application Contact Mailing Address: Organization/Firm: Koogler & Associates Street Address: 4014 NW 13th Street City: Gainesville State: FL Zip Code: 32609		
3. Application Contact Telephone Numbers: Telephone: (352) 377-5822 Fax: (352) 377-7158		

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: _____

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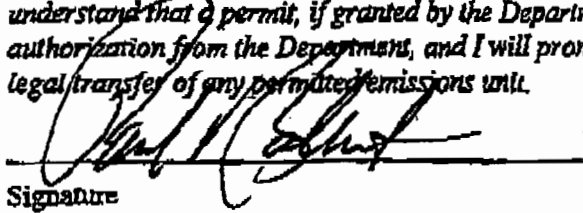
Reason for revision: _____

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- Air construction permit to make federally enforceable an assumed restriction on the potential emissions of one or more existing, permitted emissions units.
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Owner/Authorized Representative or Responsible Official

1. Name and Title of Owner/Authorized Representative or Responsible Official: Paul Ballentine, Plant Manager
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3. Owner/Authorized Representative or Responsible Official Telephone Numbers: Telephone: (407) 656-1000 Fax: (407) 656-1229
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 _____ Date <u>2/28/01</u>

* Attach letter of authorization if not currently on file.

Professional Engineer Certification

1. Professional Engineer Name: John R. Koogler, Ph.D., P.E. Registration Number: 12925
2. Professional Engineer Mailing Address: Organization/Firm: Koogler & Associates Street Address: 4014 NW 13th Street City: Gainesville State: FL Zip Code: 32609
3. Professional Engineer Telephone Numbers: Telephone: (352) 377 - 5822 Fax: (352) 377 - 7158

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

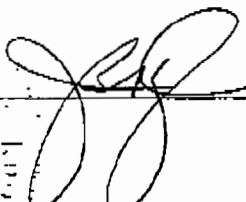
(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions 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

2/28/01

(seal)

* Attach any exception to certification statement.

Construction/Modification Information

1. Description of Proposed Project or Alterations:

Amend permit to reconcile dryer VOC emissions and peel processing rate.

2. Projected or Actual Date of Commencement of Construction: NA

3. Projected Date of Completion of Construction: NA

Application Comment

The information is submitted in the format discussed with FDEP.

II. FACILITY INFORMATION**A. GENERAL FACILITY INFORMATION****Facility Location and Type**

1. Facility UTM Coordinates: Zone: 17 East (km): 443.80 North (km): 3159.50			
2. Facility Latitude/Longitude: Latitude (DD/MM/SS): 28/33/49 Longitude (DD/MM/SS): 81/34/27			
3. Governmental Facility Code: 0	4. Facility Status Code: A	5. Facility Major Group SIC Code: 20	6. Facility SIC(s): 2037
7. Facility Comment (limit to 500 characters): Citrus processing plant.			

Facility Contact

1. Name and Title of Facility Contact: Paul Ballentine, Plant Manager			
2. Facility Contact Mailing Address: Organization/Firm: Louis Dreyfus Citrus, Inc. Street Address: P.O. Box 770399 City: Winter Garden State: FL Zip Code: 34777-0399			
3. Facility Contact Telephone Numbers: Telephone: (407) 656 - 1000 Fax: (407) 656 - 1229			

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 type="checkbox"/> Major Source of Hazardous Air Pollutants (HAPs)?	
5. <input type="checkbox"/> Synthetic Minor Source of HAPs?	
6. <input 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):	

List of Applicable Regulations

FDEP CORE LIST	
FS 120, 403	
FAC 62-4, 204, 210, 213, 214, 252, 256, 257, 281, 296, 297.	
40 CFR 52, 55, 60, 63, 82.	

C. FACILITY SUPPLEMENTAL INFORMATION**Supplemental Requirements**

1. Area Map Showing Facility Location: <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable <input checked="" type="checkbox"/> Waiver Requested
2. Facility Plot Plan: <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable <input checked="" type="checkbox"/> Waiver Requested
3. Process Flow Diagram(s): <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable <input checked="" type="checkbox"/> Waiver Requested
4. Precautions to Prevent Emissions of Unconfined Particulate Matter: <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable <input checked="" type="checkbox"/> Waiver Requested
5. Fugitive Emissions Identification: <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable <input checked="" type="checkbox"/> Waiver Requested
6. Supplemental Information for Construction Permit Application: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
7. Supplemental Requirements Comment: Information has been previously submitted to DEP.

Additional Supplemental Requirements for Title V Air Operation Permit Applications

8. List of Proposed Insignificant Activities: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" 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 checked="" type="checkbox"/> Not Applicable
10. Alternative Methods of Operation: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
11. Alternative Modes of Operation (Emissions Trading): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
12. Identification of Additional Applicable Requirements: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" 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 checked="" type="checkbox"/> Not Applicable
14. Compliance Report and Plan: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
15. Compliance Certification (Hard-copy Required): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

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.
 PO Box 770399
 Winter Garden, FL 34777-0399

COMPLETE THIS SECTION ON DELIVERY

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

C. Signature
 X *J 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 Mail 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 1450 2705

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
 Dreyful Citrus

Postmark Here

5025
 054T
 0000
 00HE
 2705

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.

PS Form 3800, July 1999 (Reverse)

102595-99-M-2087

YOUR AD APPEARED IN:

THE WEST ORANGE TIMES

DATE:

MAR. 29, 2001

**PUBLIC NOTICE OF INTENT
TO ISSUE AIR CONSTRUCTION
PERMIT MODIFICATION**

STATE OF FLORIDA

**DEPARTMENT OF
ENVIRONMENTAL PROTECTION
DEP File No. 0950053-007-AC**

**Louis Dreyfus Citrus, Inc
Modification of Permit
No. 0950053-005-AC
Orange County**

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit to Louis Dreyfus Citrus, Inc., 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 throughout limitation on the dryers. The applicant's mailing address is: PO Box 770399, Winter Garden, Florida 34777-0399. This modification will not result in an increase in emissions of air pollutants from the facility.

The Department will issue the final permit modification with its 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 the Public Notice of Intent to Issue Air Construction Permit Modification. 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 modification and require, if applicable, another Public Notice.

The Department will issue the final permit modification with its 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.

Mediation is not available in this proceeding.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, 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. 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 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.

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

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

Dept. of Environmental Protection Central District
3319 McGuire Boulevard, Suite 232, Orlando, Florida 32803-3767
Telephone: 407/894-7555

Air Program Section
Orange County Environmental Protection Department
800 Mercy Drive, Suite 4, Orlando, Florida 32808
Telephone: 407/836-1400

The complete project file includes the application, technical evaluations, draft permit modification, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Administration, New Source Review Section, or the Department's reviewing engineer for this project, Joseph Kahn, P.E., 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.

RECEIVED

APR 06 2001

BUREAU OF AIR REGULATION

BEST AVAILABLE COPY

7099 3400 0000 1449 2297

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

Article Sent To:
Paul Ballentine

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 Mgr.
Street, Apt. No., or PO Box No.
PO Box 770399
City, State, ZIP+4
Winter Garden, FL 34777-0399

PS Form 3800, July 1999

See Reverse for Instructions

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

COMPLETE THIS SECTION ON DELIVERY

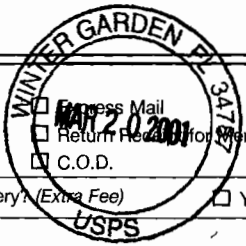
A. Received by (Please Print Clearly) B. Date of Delivery

C. Signature
x D 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)
7099 3400 0000 1449 2297