

PROPOSED Determination

PROPOSED Permit No.: 1050002-006-AV

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I. Public Notice.

An "INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT AND A TITLE V AIR OPERATION PERMIT" to Citrus World, Inc., for the Florida Natural Growers Facility located at 20205 U.S. Highway 27 North, Lake Wales, Polk County was clerked on December 21, 2005. The "PUBLIC NOTICE OF INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT AND A TITLE V AIR OPERATION PERMIT" was published in the Lake Wales News on January 12, 2006. The DRAFT Title V Air Operation Permit was available for public inspection at the Department's Southwest District office in Temple Terrace and the permitting authority's office in Tallahassee. Proof of publication of the "PUBLIC NOTICE OF INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT AND A TITLE V AIR OPERATION PERMIT" was received on January 19, 2006.

II. Public Comment(s).

Comments were received and the DRAFT Permit was changed. The comments were not considered significant enough to reissue the DRAFT Permit and require another Public Notice. Comments were received from one respondent during the 30 (thirty) day public comment period. Listed below is each comment letter in the chronological order of receipt and a response to each comment in the order that the comment was received. The comment will not be restated. Where duplicative comments exist, the original response is referenced.

A. Electronic mail from Mr. Roger Caldwell dated February 2, 2006, and received on February 2, 2006.

1. **Comment:** Please add the pellet load-out to trucks and railcars to the list of insignificant activities.

Response: The Department has reviewed the list of insignificant activities submitted with the permit application and the Appendix I-1 included with the DRAFT Title V permit and agrees that the truck and railcar pellet load-outs were omitted from Appendix I-1. These two activities will be added to Appendix I-1. In the process of reviewing Appendix I-1, the Department noticed items 7, 17, 44, 46 and 55 were included, but not requested and item 13 specified MIG rather than Arc welding. This prompted a review of Appendix U-1, the unregulated emissions units and activities. The Department discovered eight items not requested and the number of lime silos were not specified.

As a result of this comment, Appendix I-1 and Appendix U-1 are hereby changed:

From:

Appendix I-1, List of Insignificant Emissions Units and/or Activities.

Citrus World, Inc.
Florida Natural Growers Facility

DRAFT Permit No.: 1050002-006-AV
Facility ID No.: 1050002

The facilities, emissions units, or pollutant-emitting activities listed in Rule 62-210.300(3)(a), F.A.C., Categorical Exemptions, are exempt from the permitting requirements of Chapters 62-210 and 62-4, F.A.C.; provided, however, that exempt emissions units shall be subject to any applicable emission limiting standards and the emissions from exempt emissions units or activities shall be considered in determining the potential emissions of the facility containing such emissions units. Emissions units and pollutant-emitting activities exempt from permitting under Rule 62-210.300(3)(a), F.A.C., shall not be exempt from the permitting requirements of Chapter 62-213, F.A.C., if

they are contained within a Title V source; however, such emissions units and activities shall be considered insignificant for Title V purposes provided they also meet the criteria of Rule 62-213.430(6)(b), F.A.C. No emissions unit shall be entitled to an exemption from permitting under Rule 62.210.300(3)(a), F.A.C., if its emissions, in combination with the emissions of other units and activities at the facility, would cause the facility to emit or have the potential to emit any pollutant in such amount as to make the facility a Title V source.

The below listed emissions units and/or activities are considered insignificant pursuant to Rule 62-213.430(6), F.A.C.

Brief Description of Emissions Units and/or Activities

1. Nitrogen Tank (34,950 lbs capacity)
2. Tanks (pure Pak Tank) Nitrogen
3. Nitrogen Bleed-off
4. 55 Gal. drums of KOH caustic cleaner
5. Heat Seal Machine (Electric)
6. Caustic Cleaning of Product Hold Tank
7. 100 H.P. Gasoline Powered Pump (Fire Protection)
8. 4000 Gal. Tank of Caustic (40% Potassium Hydroxide)
9. Chlorine Cylinder
10. 1700 Gal. tank Chain Lube
11. 1700 Gal. tank of CS138 (Iodine Solution)
12. Caustic Make-up Tank
13. Welding (Mig & Acetylene)
14. Air Compressor
15. Minimal Spot Painting (Spray cans touch-up)
16. Rotary Saw Not continuous, occasional cutting to build
17. Screw Compressor for Ammonia Cooling System - cold storage refrigeration equip.
18. Water Base Painting of floors and walls
19. 4000 Gal. Tank CS418 (41% Sodium/Potassium Hydroxide)
20. 1500 Gal. Tank CS300 (66% Nitric Acid), for closed loop cleaning
21. 5600 Gal. Tank (50% Sodium Hydroxide)
22. Blasting Cabinet (Grit Blasting - enclosed)
23. Soy Bean Oil Base Ink
24. Pressurized CO₂ Tank
25. 200 Gal. Tank Diesel (Fire Protection)
26. One Ton Chlorine Gas Cylinders
27. Emergency Diesel Generator
28. Calcium chloride solutions
29. Corn syrup equipment
30. Process, packaging, QA, QC, research and environmental labs
31. Pesticide/Herbicide/Fungicide application
32. Steam cleaning
33. Indoor Fugitives
34. Electric Vehicles
35. Transformers, switchgear, etc.
36. Vacuum pumps
37. Refrigeration equipment
38. Asbestos removal
39. Pressure cleaning with water & soap
40. Non hazardous waste accumulation/consolidation of solids
41. Fruit processing
42. Clean-up of process and packaging

43. Containers, reservoirs, tanks for oils, wax, grease, lubricants (non-solvents)
44. Oil misters
45. Hydraulic equipment
46. Calibration gases for CEM equipment
47. Small portable equipment (small internal combustion engines)
48. Maintenance equipment
49. Mobile equipment (vehicles on property)
50. Steam systems
51. Water baths
52. Maintenance Shop Parts Washer (Safety Kleen, using less than 525 gals/yr)
53. 3 Electric Heaters to Shrink Plastic Sheet
54. Cooling Tower (Pure well water & cl. for bacteria)
55. Water sample ports
56. Natural gas distribution
57. Electrically heated equipment used for heat treating, tracing, drying, case hardening, surface conditioning, etc.
58. Safety devices (Pressure relief vents)

Appendix U-1, List of Unregulated Emissions Units and/or Activities.

Citrus World, Inc.
Florida Natural Growers Facility

DRAFT Permit No.: 1050002-006-AV
Facility ID No.: 1050002

Unregulated Emissions Units and/or Activities. An emissions unit which emits no “emissions-limited pollutant” and which is subject to no unit-specific work practice standard, though it may be subject to regulations applied on a facility-wide basis (e.g., unconfined emissions, odor, general opacity) or to regulations that require only that it be able to prove exemption from unit-specific emissions or work practice standards.

The below listed emissions units and/or activities are neither ‘regulated emissions units’ nor ‘insignificant emissions units’.

E.U.
ID
No.
-026

Brief Description of Emissions Units and/or Activity

- Facility Wide Fugitive Emissions (described below):
- Propane Tank 1000 gal. storage tanks
 - Building Ventilation (Does not include ventilation for human comfort that does not exhaust air pollutants)
 - 5 Video Jet Printers (Prints on Cartons)
 - 5 Diograph Printers (Prints on Boxes)
 - Fullers Hot Melt Glue Machines
 - 150 Gal. Above Ground Gasoline Tank (Fire Protection)
 - National Hot Melt Glue
 - Air Stripper (EDI Groundwater Remediation)
 - Juice Extractor (Citrus Vapor)
 - 1500 Gal. Tank CS300 (66% Nitric Acid, 16% Phosphoric Acid)
 - 1200 Gal. Tank CS100 (0-4% Methanol)
 - Lime Storage Silo
 - 20,000 Gal. D-Limonene Tank
 - 1200 Gal. Tank (98% Sulfuric Acid)
 - Clean-up Solvent (WashV-120)

E.U.
ID
No.

Brief Description of Emissions Units and/or Activity

- Econo Wash (50% Naptha, 50% Stoddard Solvent)
- 16,000 Gal. Tank of Diesel (Above ground)
- 72,000 Gal. #6 Fuel Oil Tanks
- 2,000 Gal. Tank of Gasoline (Above ground)
- Fuller Adhesive (HM 1610) Liquid (10% Mineral Oil)
- Bulk storage silos for sand, soda ash, limestone, salt cake/aplite, glass cullet; lime
- Mixed batch silos
- Routine maintenance/repair activities
- Solvent/Chemical/Raw Material Storage
- Biogas distribution
- Used oil tanks
- Ethylene Glycol
- Mineral spirits
- Oil/Water separator

To:

Appendix I-1, List of Insignificant Emissions Units and/or Activities.

Citrus World, Inc.

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Florida Natural Growers Facility

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52. Natural gas distribution
53. Electrically heated equipment used for heat treating, tracing, drying, case hardening, surface conditioning, etc.
54. Safety devices (Pressure relief vents)
55. Truck Pellet Loading Station
56. Rail Car Pellet Loading Station

