

SWD INTERNAL PERMITTING MEMORANDUM

TO: Mara Grace Nasca
District Air Program Administrator

THRU: Cindy Zhang-Torres, P.E.
Air Permitting Manager

FROM: Nancy E. Knight
Air Permitting Engineer

DATE: December 22, 2010

SUBJECT: Draft/Proposed Permit No: 1050002-007-AV
Facility Name: Citrus World

Day 90: March 21, 2011

Citrus World Inc., dba Florida's Natural Growers, Inc., submitted an application to renew their Title V permit for a citrus processing plant on August 24, 2010.

I sent a request for additional information letter on September 20, 2010, and received a response on November 2, 2010. The application was not deemed complete at this time because there were still questions about the diesel and gasoline engines that are subject to 40 CFR 63 Subpart ZZZZ and 40 CFR 60, Subparts IIII and JJJJ. Several emails (see permitting file) were needed to get all the necessary information. The application was deemed complete on December 21, 2010.

The permit was written using the new Tallahassee Title V format. Six emission units were added to address the engines. Other changes to the permit include correcting the water removal capacity for Peel Dryers 2 and 3 (they were reversed in the permit).

I received comments from Nedin Bahtic on August 30, 2010. He inspected the facility on April 15, 2010. He discovered that they had been burning diesel fuel containing more than 0.1% sulfur. This was an enforcement case that closed on December 20, 2010.

I received an email from Natrevia Gradney on August 25, 2010, mentioning the above case and a closed case in 2009 for failure to perform the VOC/oil recovery calculations for 2006 and 2007.

I recommend that this Intent to Issue and Draft/Proposed permit be sent out as attached and submit it for your review and approval.