FLORIDA DEPARTMENT OF Environmental Protection

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PERMITTEE

Tropicana Manufacturing Company, Inc.
6500 Glades Cut-Off Road
Ft. Pierce, Florida 34981-4303

Authorized Representative:
Mr. Benjamin Mills, Plant Director

Air Permit No. 1110004-018-AC
Permit Expires: May 30, 2023
Minor Air Construction Permit
Fort Pierce Citrus Processing Facility
Replacement of Steam Boiler No. 2

PROJECT

This is the final air construction permit, which authorizes replacement of the existing Emissions Unit (EU) 003 - Keystone Steam Generating Boiler (a.k.a. Steam Boiler No. 2) with a new and more efficient unit. The proposed work will be conducted at the existing Fort Pierce Citrus Processing Facility, which produces various citrus products and animal feed (Standard Industrial Classification Code No. 2033). The existing Fort Pierce Citrus Processing Facility is in St. Lucie County at 6500 Glades Cut-Off Road, Ft. Pierce, Florida, 34981-4303. UTM Coordinates are: Zone 17, 559.61 km East, and 3028.32 km North. Latitude is: 27° 22' 42" North; and, Longitude is: 80° 23' 28" West.

This final permit is organized into the following sections: Section 1 (General Information); Section 2 (Administrative Requirements); Section 3 (Emissions Unit Specific Conditions); and Section 4 (Appendices). Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 of this permit.

STATEMENT OF BASIS

This air pollution construction permit is issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to conduct the proposed work in accordance with the conditions of this permit. This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Upon issuance of this final permit, any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes 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 30 days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida

David Lyle Read, P.E., Environmental Administrator
Office of Permitting and Compliance
Division of Air Resource Management

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Construction Permit package was sent by electronic mail, or a link to these documents made available electronically on a publicly accessible server, with received receipt requested before the close of business on the date indicated below to the following persons.

Mr. Benjamin Mills, Plant Director, Tropicana: Benjamin.L.Mills@PepsiCo.com
Mr. Scott Davis, EHS Manager, Tropicana: Scott.Davis@PepsiCo.com
Mr. Robert Fox, P.E., ERM: Bob.Fox@erm.com
DEP SED Office: SED.AIR@dep.state.fl.us
Ms. Barbara Friday, DEP OPC: Barbara.Friday@FloridaDEP.gov
Ms. Lynn Scearce, DEP OPC: Lynn.Scearce@FloridaDEP.gov

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.

FACILITY DESCRIPTION

This existing facility produces various citrus products and animal feed. Operation of the plant includes juice extraction, processing, cold storage, and feed mill facilities. The facility consists of two peel dryers with associated waste heat evaporators and an integral wet scrubber, two pellet mills, two pellet coolers equipped with common venturi scrubber, two process steam boilers (each with a maximum heat input rate of 63.4 MMBtu/hour), a packaged fire-tube boiler with a maximum heat input rate of 20.9 MMBtu/hour co-firing natural gas and/or landfill gas, a process steam boiler with a maximum heat input rate of 99.8 MMBtu/hour, and a cogeneration plant to generate electrical power and steam for facility operations.

The existing Fort Pierce Citrus Processing Facility consists of the following emissions units (EU).

EU No.	Brief Description
001	Citrus Peel Dryer No. 1 with Waste Heat Evaporator
002	Keystone Steam Generating Boiler (Steam Boiler No. 1)
003	Keystone Steam Generating Boiler (Steam Boiler No. 2) (Inactive)
004	Citrus Peel Dryer No. 2 with Waste Heat Evaporator
006	Kewanee Steam Package Boiler (burning natural gas and/or landfill gas)
007	Citrus Feed Coolers
008	D-Type Abco Industries Process Steam Boiler
016	Cogeneration Plant
017	Emergency Generator (Newly Regulated Unit)
018	Two Stationary Fire Pump Engines (Newly Regulated Unit)

PROPOSED PROJECT

The project is for a minor source air construction permit. The project is for replacement of the existing Emissions Unit (EU) 003 - Keystone Steam Generating Boiler (a.k.a. Steam Boiler No. 2) with a new and more efficient unit as listed below.

EU ID No.	Emissions Unit Description
020	Johnston Steam Generating Boiler

FACILITY REGULATORY CLASSIFICATION

- Title III: The facility is a major source of hazardous air pollutants (HAP).
- Title IV: The facility does not operate units subject to the acid rain provisions of the Clean Air Act.
- Title V: The facility is a Title V major source of air pollution in accordance with Chapter 62-213, Florida Administrative Code (F.A.C.).
- PSD: The facility is a Prevention of Significant Deterioration (PSD)-major stationary source in accordance with Rule 62-212.400, F.A.C.
- NSPS: The facility operates units subject to the New Source Performance Standards (NSPS) of Title 40, Part 60 of the Code of Federal Regulations (40 CFR 60).
- NESHAP: The facility operates units subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) of 40 CFR 63.

SECTION 2. ADMINISTRATIVE REQUIREMENTS

1. Permitting Authority: The permitting authority for this project is the Office of Permitting and Compliance in the Division of Air Resource Management of the Department of Environmental Protection (Department). The Office of Permitting and Compliance mailing address is 2600 Blair Stone Road (MS #5505), Tallahassee, Florida 32399-2400.

2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Florida Department of Environmental Protection Southeast District Office at: 3301 Gun Club Road, MSC 7210-1, West Palm Beach, FL 33406.

3. Appendices: The following Appendices are attached as a part of this permit: Appendix A (Citation Formats and Glossary of Common Terms); Appendix B (General Conditions); Appendix C (Common Conditions); and, Appendix D (Common Testing Requirements).

4. Applicable Regulations, Forms and Application Procedures: Unless otherwise specified in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.

5. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]

6. Modifications: The permittee shall notify the Compliance Authority upon commencement of construction, within 15 days. No new emissions unit shall be constructed and no existing emissions unit shall be modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]

7. Construction and Expiration: The expiration date shown on the first page of this permit provides time to complete the physical construction activities authorized by this permit, complete any necessary compliance testing, and obtain an operation permit. Notwithstanding this expiration date, all specific emissions limitations and operating requirements established by this permit shall remain in effect until the facility or emissions unit is permanently shut down. For good cause, the permittee may request that a permit be extended. Pursuant to Rule 62-4.080(3), F.A.C., such a request shall be submitted to the Permitting Authority in writing before the permit expires. [Rules 62-4.070(3) & (4), 62-4.080 & 62-210.300(1), F.A.C.]

8. Source Obligation: At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by virtue of a relaxation in any enforceable limitation which was established after August 7, 1980, on the capacity of the source or modification otherwise to emit a pollutant, such as a restriction on hours of operation, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification. [Rule 62-212.400(12), F.A.C.]

9. Application for Title V Air Operation Permit: This permit authorizes the construction of a new emissions unit (equipment). A Title V air operation permit is required for regular operation of the permitted emissions unit. The permittee shall apply for a **revision to the facility's Title V air operation permit to include the new emissions unit** at least 90 days prior to expiration of this permit, but no later than 180 days after submitting the last initial compliance demonstration test report or 180 days after demonstrating initial compliance. To apply for a Title V air operation permit, the applicant shall submit the appropriate application form, compliance test results, and such additional information as the Department may by law

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require. The application shall be submitted to the appropriate Permitting Authority with copies to the Compliance Authority. [Rules 62-4.030, 62-4.050, 62-4.220 & 62-213, F.A.C.]

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SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

A. Johnston Steam Generating Boiler - EU ID No. 020

This section of the permit addresses the following emissions unit.

EU ID No.	Emissions Unit Description
020	Johnston Steam Generating Boiler

This nominal 40 MMBtu/hour Johnston 509 Series fire-tube replacement boiler will be operated as needed to meet base plant operational and seasonal fruit processing steam demands. The boiler is manufactured by Johnston, and has a Model Number of PFTX1200-4X225S.

This Johnston 509 Series fire-tube boiler is replacing the inactive Keystone Steam Generator No. 2 (EU 003).

Combustion of either or both natural gas and landfill gas are considered to qualify as "gas 1 subcategory" is considered to be a "gas 1 subcategory" under 40 CFR 63, Subpart DDDDD (see 40 CFR 63.7575, Definitions). The boiler is therefore not subject to the emission limits or the operating limits of 40 CFR 63, Subpart DDDDD. There is a tune-up requirement for the boiler.

{Permitting Note: This emission unit is regulated under: Rule 62-296.406, F.A.C., Fossil Fuel Steam Generators with less than 250 MMBtu/hour Heat Input, New and Existing Units; 40 CFR 63, Subpart DDDDD, NESHAP for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters, adopted and incorporated by reference in Rule 62-204.800, F.A.C.; and, 40 CFR 60, Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units, adopted and incorporated by reference in Rule 62-204.800, F.A.C. 40 CFR 60, Subpart Dc imposes only a recordkeeping requirement.}

PREVIOUS APPLICABLE REQUIREMENTS

1. Effect on Other Permits: The conditions of this permit supplement all previously issued air construction and operation permits for these emissions units. Unless otherwise specified, these conditions are in addition to all other applicable permit conditions and regulations. [Rule 62-4.070(1)&(3), *Reasonable Assurance*, F.A.C.]

AUTHORIZATION

2. Authorization - Permitted Capacity: The permittee is authorized to install a new boiler fired by natural gas and/or landfill gas (LFG) with a heat input rating of no more than 40 million British thermal units per hour (MMBtu/hour) to replace Unit 2. [Application No. 1110004-018-AC; Applicant Request; and, Rule 62-210.200, Definitions - Potential to Emit.]

ESSENTIAL POTENTIAL TO EMIT (PTE) PARAMETERS

3. Methods of Operation - Fuel: The boiler shall fire only natural gas and/or landfill gas (LFG). [Application No. 1110004-018-AC; and, Rules 62-210.200, Definitions - PTE, & 62-296.406(2) & (3), F.A.C.]

4. Methods of Operation - Fuels: The boiler shall be fired exclusively on natural gas and/or landfill gas (LFG). [BACT Determination for particulate matter (PM) and sulfur dioxide (SO_2) emissions under Rule 296.406(2) & (3), F.A.C.; Rule 62-213.410(1) & 62-213.440(1), Methods of Operation, F.A.C.; and, Applicant's Request.]

5. Hours of Operation: This emissions unit may operate continuously (8,760 hours/year). [Rule 62-210.200, Definitions - PTE, F.A.C.]

EMISSION LIMITATIONS AND STANDARDS

6. Visible Emissions: Visible emissions (VE) shall not exceed 20% except for one six-minute period per hour during which opacity shall not exceed 27%. [Rule 62-296.406(1), F.A.C.]

7. Particulate Matter Emissions: Particulate matter (PM) emissions shall be controlled by the firing of natural gas and/or landfill gas (LFG). [Rule 62-296.406(2), F.A.C.]

8. Sulfur Dioxide Emissions: Sulfur dioxide (SO_2) emissions shall be controlled by the firing of natural gas and/or landfill gas (LFG). [Rule 62-296.406(3), F.A.C.]

COMPLIANCE DEMONSTRATION

9. VE - Initial Compliance Demonstration: Within 60 days after the project's completion, the boiler shall be tested for initial compliance with the VE emission standard. The compliance demonstration report shall be submitted within 45 days of completion of the test. [Rules 62-4.070(1)&(3) and 62-297.310(10), F.A.C.]

10. Compliance Test Notification: The permittee shall notify the Compliance Authority in writing at least 15 days prior to any required compliance tests. The notification must include the following information: the date, time, and location of each test; the name and telephone number of the facility's contact person who will be responsible for coordinating the test; and the name, company, and the telephone number of the person conducting the test. [Rules 62-4.070(1)&(3) and 62-297.310(9), F.A.C.]

TEST METHODS AND PROCEDURES

11. Test Methods: When required, tests shall be performed in accordance with the following reference method:

EPA Method	Description of Method and Comments
9	Visual Determination of the Opacity of Emissions from Stationary Sources

The above method is described in 40 CFR 60, Appendix A, and adopted by reference in Rule 62-204.800, F.A.C. No other methods may be used unless prior written approval is received from the Department. [Rule 62-204.800, F.A.C.; 40 CFR 60, Appendix A.]

TUNE-UPS

12. Boilers with > 10 MMBtu/hr heat input capacity: The permittee must conduct a tune-up of the boiler every five years since this unit will have a continuous oxygen trim system to maintain an optimum air to fuel ratio as specified in 40 CFR 63.7540(a)(12). [40 CFR 63.7540(a)(12) (Subpart DDDDD).]

    {*Permitting Note: The tune-up will be conducted as a work practice for all regulated emissions under 40 CFR 63, Subpart DDDDD.*}

REPORTING AND RECORDKEEPING

13. Reporting: The permittee shall notify the compliance authority of when the project was completed, within 15 days of its completion. [Application No. 1110004-018-AC; and, Rule 62-4.070(1)&(3), *Reasonable Assurance*, F.A.C.]

14. Semi-Annual Reporting: A report meeting the requirements of 40 CFR 63.7550(b), shall be sent to the Compliance Authority every six months. The reporting period is defined by the Department as from January 1 to June 30 & from July 1 to December 31 of each calendar year. [40 CFR 63.7550(b) (Subpart DDDDD).]

15. Tune-up Documentation: The facility shall maintain records of the tune-up. [Rules 62-213.440(1), 62-4.070(1)&(3) and 62-204.800(11)(b), F.A.C.; and, 40 CFR 63.7500.]

16. Records - 40 CFR 60, Subpart Dc: The permittee shall record and maintain records of the amount of fuel combusted in this emissions unit during each calendar month. The records shall be maintained for a period of two years following the date of each record. [40 CFR 60.48c(g)(2) & (i).]

40 CFR 63, SUBPART DDDDD

17. Federal Applicable Requirements: This emissions unit is subject to the applicable provisions of 40 CFR 63, Subpart DDDDD - National Emissions Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters, which is adopted by reference in Rule 62-204.800, F.A.C. [Rules 62-204.800(11)(b), F.A.C.; and, 40 CFR 63, Subpart DDDDD.]