PERMITTEE

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

PERMITTING AUTHORITY

Florida Department of Environmental Protection (Department)
Division of Air Resource Management
Office of Permitting and Compliance
2600 Blair Stone Road, MS #5505
Tallahassee, Florida 32399-2400

PROJECT

Permit No. 1110004-018-AC
Application for Minor Source Air Construction Permit

PUBLIC NOTICE

The Department distributed a draft air construction permit package on May 25, 2021. The applicant published the Public Notice in the St. Lucie News Tribune in Vero Beach, St. Lucie County, Florida on May 28, 2021. The Department received proof of publication on June 7, 2021. No requests for an administrative hearing or requests for an extension of time in which to file a petition for an administrative hearing were received by the Agency Clerk in the Department's Office of General Counsel.

COMMENTS

No comments on the permit were received from the public or the U.S. EPA Region 4 Office during the 14-day public comment period. Comments on the permit were received from the Applicant during the 14-day public comment period. The applicant's comments are listed below followed by the Department's responses.

All changes are emphasized with yellow highlight in this document only. Additions to the permit are indicated below by double underline. Deletions from the permit are indicated below by ~~strike through~~.

1. Section 1, Facility Description: 1st paragraph, 2nd line - change the term "feed milling" to "feed mill" to be more precise.

   Department's Response

   The clarification is made; the facility description is changed to read as follows:

   "…

   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~~ing~~ facilities. …"

2. Section 3, A. Johnston Steam Generating Boiler: 2nd paragraph, 1st line – add the word "nominal" before 40 MMBtu/hour. The boiler is actually rated at 1200 boiler horsepower which roughly converts to 40.17 MMBtu/hour.

   Department's Response

   The permit application indicates that also. The clarification is made; the emission unit description is changed to read as follows:

   "…

   This section of the permit addresses the following emissions unit.

EU ID	Emissions Unit Description

No.	
020	Johnston Steam Generating Boiler

This nominal 40 MMBtu/hour Johnston 509 Series fire-tube replacement boiler …"

3. Section 3, A. Johnston Steam Generating Boiler: 4th paragraph, 1st line – change the term "Natural gas" to "Landfill gas," or revise this paragraph to indicate that combustion of either or both natural gas and landfill gas qualify the boiler for classification in the "Units designed to burn gas 1 fuels" subcategory.

Department's Response

This AC permit application did cover these fuel types. Specific condition 3.A.2. listed both fuel types. The EU description is corrected to read as follows:

"…
~~Natural gas is~~ Combustion of either or both natural gas and landfill gas are considered to ~~be a~~ qualify as "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.
…"

4. Section 3, Emission Limitations and Standards: Conditions 3.A.7. and 3.A.8. should both refer to the firing of natural gas and/or landfill gas (LFG).

Department's Response

Again, this AC permit application did cover these fuel types. Specific condition 3.A.2. listed both fuel types. Specific conditions 3.A.7c and 3.A.8. are corrected to read as follows:

"…
EMISSION LIMITATIONS AND STANDARDS

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.]

…"

5. Section 3, Tune-Ups: Condition 3.A.12. should actually require conduct of the boiler tune up every five years since this unit will have a continuous oxygen trim system to maintain an optimum air to fuel ratio. The correct regulatory citation is 40 CFR 63.7549(a)(12). [*Note: Tropicana normally tunes all the Fort Pierce boilers annually as part of its energy management program, but the permit should only address the specific applicable requirements from the regulation.*]

Department's Response

For this boiler with a continuous oxygen trim system the 5-year frequency is correct; the specific condition and the regulatory citation are corrected to read as follows:

"…
TUNE-UPS

12. Boilers with > 10 MMBtu/hr heat input capacity: The permittee must conduct a tune-up of the boiler ~~annually~~ 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).]

…"

6. Section 3, Reporting and Recordkeeping: Since the first tune-up will not be required for 5 years after installation, can documentation from the initial commissioning of the boiler be used to satisfy the intent of Condition 3.A.15.?

   Department's Response

   With the first one due 5 years later, not 1 year later there is no need to submit it with the air operation permit application. This specific condition is corrected to read as follows:

   "…

   15. Tune-up Documentation: The facility shall maintain records of the tune-up. ~~A copy of the tune-up record shall be submitted along with the air operation permit application.~~ [Rules 62-213.440(1), 62-4.070(1)&(3) and 62-204.800(11)(b), F.A.C.; and, 40 CFR 63.7500.]

   …"

CONCLUSION

The final action of the Department is to issue the final permit with the administrative corrections and/or clarifications as noted above.