STATEMENT OF BASIS

Tropicana Manufacturing Company, Inc.
Tropicana Fort Pierce
Facility ID No.: 1110004
St. Lucie County

Title V Air Operation Permit Revision
FINALPermit Project No.: 1110004-016-AV
Revision to Title V Air Operation Permit No.: 1110004-012-AV

The initial Title V Air Operation Permit, No. 1110004-012-AV, was issued/effective on October 13, 2011. This Title V Air Operation Permit Revision is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210 and 62-213. The above named permittee is hereby authorized to operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

This permit revision is being issued for the purpose of incorporating the terms and conditions of air construction permits Nos. 1110004-013-AC and 1110004-015-AC for the modification of Steam Package Boiler No. 3 (Emissions Unit 006) to co-fire natural gas or landfill gas and the addition of a new 1.6 megawatt cogeneration plant, consisting of a Caterpillar (Model G3520C) reciprocating internal combustion engine (RICE) generator set. Also, a mobile emergency generator manufactured by Triton Power Inc. (Model AC 1500) will be added to the insignificant emissions units list (Appendix I).

The final TV operation permit will authorize Tropicana Manufacturing Company, Inc., to add a new 1.6 megawatt Cogeneration Plant consisting of a Caterpillar (Model G3520C) reciprocating internal combustion engine (RICE) generator set. The cogeneration plant will primarily fire landfill gas, using natural gas as a backup fuel, and will generate electrical power and steam for facility operations. The cogeneration plant unit is subject to the requirements of 40 CFR part 60 Subpart, JJJJ, Standards of Performance for Stationary Spark Ignition Internal Combustion Engines" (SI) and the requirements of 40 CFR 63, subpart ZZZZ "National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines. Also, the modification of Emissions Unit 006 to co-fire natural gas and/or landfill gas will be incorporated into the final TV operation permit.

CAM does not apply.

Also, included in this permit are miscellaneous unregulated/insignificant emissions units and/or activities.

Based on the Title V Air Operation Permit Revision application received February 14, 2012, this facility is a major source of hazardous air pollutants (HAP).