

P 832 539 836



### Certified Mail Receipt

No Insurance Coverage Provided  
Do not use for International Mail  
(See Reverse)

PS Form 3800, June 1990

Sent to	John Cox
Street & No.	Coca Cola
P.O., State & ZIP Code	11 Cloud St. Leesburg, FL
Postage	
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Address of Delivery	
TOTAL Postage & Fees	\$
Postmark or Date	7-30-91 AC 35-195880

#### SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece next to the article number.

I also wish to receive the following services (for an extra fee):

- 1.  Addressee's Address
- 2.  Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

Mr. John Cox, Jr.  
Coca Cola Foods  
11 Cloud St  
Leesburg, FL 34748

4a. Article Number

P 832 539 836

**RECEIVED**

4b. Service Type

Registered  Insured

Certified  COD

Express Mail  Return Receipt for Merchandise

AUG 5 1991

7. Date of Delivery

Division of Air

5. Signature (Addressee)

8. Addressee's Signature (if requested and fee is paid)

6. Signature (Agent)

*[Handwritten Signature]*

PS Form 3811, October 1990

U.S. GPO: 1990-273-861

**DOMESTIC RETURN RECEIPT**

return

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION  
NOTICE OF PERMIT

In the matter of an  
Application for Permit by:

DER File No. AC 35-195880  
Lake County

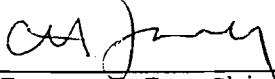
Mr. John Cox, Jr., Plant Manager  
Coca Cola Foods  
11 Cloud Stree  
Leesburg, Florida 34748

Enclosed is Permit Number AC 35-195880 to install a 55 MMBtu/hr package boiler at your facility in Leesburg, Lake County, Florida. This permit is issued pursuant to Section(s) 403, Florida Statutes.

Any party to this Order (permit) has the right to seek judicial review of the permit pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400; 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 of Appeal must be filed within 30 days from the date this Notice is filed with the Clerk of the Department.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION

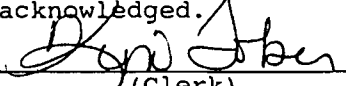
  
C. H. Fancy, P.E., Chief  
Bureau of Air Regulation  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400  
904-488-1344

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF PERMIT and all copies were mailed before the close of business on 7-30-91 to the listed persons.

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED,  
on this date, pursuant to  
§120.52(11), Florida Statutes,  
with the designated Department  
Clerk, receipt of which is hereby  
acknowledged.

  
(Clerk)

7-30-91  
(Date)

Copies furnished to:

C. Collins, CD  
K. Given, P.E.  
A. Corkum, CCF

Final Determination

Coca Cola Foods  
Lake County  
Leesburg, Florida

Intallation of No. 4 Boiler

Permit Number: AC 35-195880

Department of Environmental Regulation  
Division of Air Resources Management  
Bureau of Air Regulation

July 26, 1991

## Final Determination

The Technical Evaluation and Preliminary Determination for the permit to construct a 55 MMBtu/hr package boiler at Coca Cola Foods in Leesburg, Lake County, Florida, was distributed on July 1, 1991. The Notice of Intent to Issue was published in The Daily Commercial on July 11, 1991. Copies of the evaluation were available for public inspection at the Department's Tallahassee and Orlando offices.

No comments were submitted on the Department's Intent to Issue the permit. The final action of the Department will be to issue construction permit AC 35-195880 as proposed in the Technical Evaluation and Preliminary Determination.



# Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Carol M. Browner, Secretary

**PERMITTEE:**  
Coca Cola Foods  
11 Cloud Street  
Leesburg, Florida 34748

**Permit Number:** AC 35-195880  
**Expiration Date:** Dec. 31, 1992  
**County:** Lake  
**Latitude/Longitude:** 28°49'54"N  
81°49'40"W  
**Project:** No. 4 Gas Fired Package  
Boiler

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 17-2 and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawings, plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

For the installation of a 55 MMBtu/hr package boiler at Coca Cola Food's facility in Leesburg, Lake County, Florida.

The source shall be constructed in accordance with the permit application, plans, documents, amendments and drawings, except as otherwise noted in the General and Specific Conditions.

Attachments are listed below:

1. Application package received April 19, 1991.

PERMITTEE:  
Coca Cola Foods

Permit Number: AC 35-195880  
Expiration Date: December 31, 1992

**GENERAL CONDITIONS:**

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.

2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.

3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.

4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.

5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

**PERMITTEE:**  
Coca Cola Foods

**Permit Number:** AC 35-195880  
**Expiration Date:** December 31, 1992

**GENERAL CONDITIONS:**

6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:

- a. Have access to and copy any records that must be kept under the conditions of the permit;
- b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:

- a. a description of and cause of non-compliance; and
- b. the period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

PERMITTEE:  
Coca Cola Foods

Permit Number: AC 35-195880  
Expiration Date: December 31, 1992

**GENERAL CONDITIONS:**

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 17-4.120 and 17-30.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

12. This permit or a copy thereof shall be kept at the work site of the permitted activity.

13. This permit also constitutes a Determination of Best Available Control Technology (BACT).

14. The permittee shall comply with the following:

- a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
- b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance



PERMITTEE:  
Coca Cola Foods

Permit Number: AC 35-195880  
Expiration Date: December 31, 1992

**GENERAL CONDITIONS:**

records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.

c. Records of monitoring information shall include:

- the date, exact place, and time of sampling or measurements;
- the person responsible for performing the sampling or measurements;
- the dates analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and
- the results of such analyses.

15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

**SPECIFIC CONDITIONS:**

1. The construction and operation of this source shall be in accordance with the capacities and specifications stated in the application.

2. The new No. 4 package boiler may operate continuously (8760 hrs/yr). The existing No. 4 boiler shall permanently cease operation prior to the startup of the new boiler.

3. Only natural gas shall be fired in the boiler. The boiler heat input shall not exceed 55 MMBtu/hr, reflecting a steam generation rate of approximately 50,000 lbs/hr.

4. Visible emissions (VE) shall not exceed 5% opacity. Initial and annual compliance tests shall be conducted using DER Method 9 for VE.

PERMITTEE:  
Coca Cola Foods

Permit Number: AC 35-195880  
Expiration Date: December 31, 1992

**SPECIFIC CONDITIONS:**

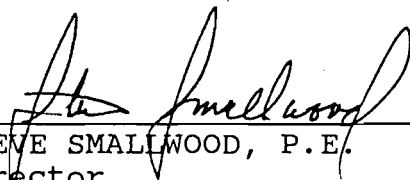
5. The Department shall be notified in writing 15 days or more prior to each compliance test. The tests shall be conducted at permitted production capacity or no less than 90% thereof. Actual heat input rate during the test shall be reported along with the emission results. Test reports shall be submitted to the Department's Central District office within 45 days of compliance test completion.

8. The permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the Bureau of Air Regulation prior to 60 days before the expiration of the permit (F.A.C. Rule 17-4.090).

9. An application for an operation permit must be submitted to the Central District office at least 90 days prior to the expiration date of this construction permit. To properly apply for an operation permit, the applicant shall submit the appropriate application form, fee, certification that construction was completed noting any deviations from the conditions in the construction permit, and compliance test reports as required by this permit (F.A.C. Rules 17-4.055 and 17-4.220).

Issued this 26<sup>th</sup> day  
of July, 1991

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION

  
\_\_\_\_\_  
STEVE SMALLWOOD, P.E.  
Director  
Division of Air Resources  
Management

Best Available Control Technology (BACT) Determination  
Coca Cola Foods  
Lake County

The applicant plans to install a new 55 MMBtu/hr gas-fired boiler at their facility in Leesburg, Florida. The boiler will fire only natural gas. This BACT determination is required for the source as set forth in the Florida Administrative Code Rule 17-2.600(6) - Emission Limiting and Performance Standards.

BACT Determination Request by the Applicant:

The applicant was not aware of the requirement of BACT determinations for particulate and sulfur dioxide emissions. The Department elected to process the application and to disregard this deficiency in the application.


BACT Determination by DER:

The amount of particulate and sulfur dioxide emissions from the boiler will be limited by the firing of natural gas. Visible emissions shall not exceed 5% opacity.

Details of the Analysis May Be Obtained By Contacting:


Barry Andrews P.E., BACT Coordinator  
Department of Environmental Regulation  
Bureau of Air Regulation  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Recommended By:

  
\_\_\_\_\_  
C. H. Fancy, P.E., Chief  
Bureau of Air Regulation

July 26, 1991  
Date

Approved By:

  
\_\_\_\_\_  
Steve Smallwood, P.E. Director  
Division of Air Resource Management

July 26, 1991  
Date



State of Florida  
DEPARTMENT OF ENVIRONMENTAL REGULATION

For Routing To Other Than The Addressee	
To: _____	Location: _____
To: _____	Location: _____
To: _____	Location: _____
From: _____	Date: _____

# Interoffice Memorandum

TO: Steve Smallwood  
FROM: Clair Fancy *CF*  
DATE: July 26, 1991  
SUBJ: Approval of Construction Permit AC 35-195880  
Coca Cola Foods

Attached for your approval and signature is a permit prepared by the Bureau of Air Regulation for the above mentioned company to install a 55 MMBtu/hr package boiler at their facility in Leesburg, Lake County, Florida.

No comments were received during the public notice period.

I recommend your approval and signature.

CF/JR/plm

Attachments

*OK/Thank you*  
*[Signature]*  
*7-26-91*

Check Sheet

Company Name: *Coca Cola Foods*

Permit Number: *A 235-195000*

PSD Number:

County: *Lake*

Permit Engineer:

Others involved:

Application:

- Initial Application
- Incompleteness Letters
- Responses
- Final Application (if applicable)
- Waiver of Department Action
- Department Response

Intent:

- Intent to Issue
- Notice to Public
- Technical Evaluation
- BACT Determination
- Unsigned Permit

Attachments:

- 
- 
- 
- Correspondence with:
  - EPA
  - Park Services
  - County
  - Other
- Proof of Publication
- Petitions - (Related to extensions, hearings, etc.)

Final Determination:

- Final Determination
- Signed Permit
- BACT Determination

Post Permit Correspondence:

- Extensions
- Amendments/Modifications
- Response from EPA
- Response from County
- Response from Park Services

P 872 562 585



### Receipt for Certified Mail

No Insurance Coverage Provided  
Do not use for International Mail  
(See Reverse)

Sent to Mr. Aaron P. Corkum	
Street and No. P. O. Box 490720	
P.O., State and ZIP Code Leesburg, Florida 34749-0720	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date Mailed: 1/24/94 AC35-135881 - A035-153889	

PS Form 3800, JUNE 1991

Is your RETURN ADDRESS completed on the reverse side?

#### SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

- Addressee's Address
- Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:  
Mr. Aaron P. Corkum  
Environmental Coordinator  
Coca Cola Foods  
P. O. Box 490720  
Leesburg, Florida 34749-0720

4a. Article Number  
P 872 562 585

4b. Service Type  
 Registered     Insured  
 Certified     COD  
 Express Mail     Return Receipt for Merchandise

7. Date of Delivery  
1-28-94

5. Signature (Addressee)  
*[Signature]*

6. Signature (Agent)  
*[Signature]*

8. Addressee's Address (Only if requested and fee is paid)

Thank you for using Return Receipt Service.

PS Form 3811, December 1991

★U.S. GPO: 1992-323-402

DOMESTIC RETURN RECEIPT



# Florida Department of Environmental Protection

Lawton Chiles  
Governor

Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Virginia B. Wetherell  
Secretary

January 25, 1994

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Aaron P. Corkum  
Environmental Coordinator  
Coca Cola Foods  
P.O. Box 490720  
Leesburg, FL 34749-0720

Dear Mr. Corkum:

RE: AC 35-135881 - A035-153889  
3550 KW Combined Cycle Gas Turbine

The Bureau of Air Regulation (BAR), received your letter dated January 11, 1994 and your application dated August 25, 1993 (originally submitted to the Department's Central District office) that requested:

- 1) to test NO<sub>x</sub> emissions only upon operating permit renewal, and
- 2) to increase the fuel consumption of the waste heat boiler while burning No. 6 fuel oil and the hours of operation of the combustion turbine while burning No. 2 fuel oil.

The Department (BAR) evaluated your requests and determined that the proposed increase in the hours of operation and fuel consumption will increase actual SO<sub>2</sub> emissions from these sources by 47.9 TPY (as stated in the application) for this pollutant. This is a modification which will require a new construction permit for these sources.

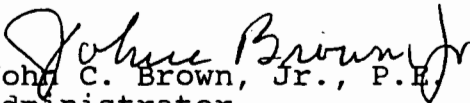
The Department's Central District office will be processing this application. BAR will make the Best Available Control Technology (BACT) determination. Please submit an application fee of \$2000 to the Department's Central District office so the Department can begin processing your application.

*Doug, 2-3  
Do you have  
the Coca-Cola  
info for the BACT?  
If so, can you keep  
this with it? Patty*

Mr. Aaron P. Corkum  
January 25, 1994  
Page Two

Should you have any questions, please feel free to call Mr. Preston Lewis at (904) 488-1344 or write to me at the above address.

Sincerely,

  
John C. Brown, Jr., P.E.  
Administrator  
Air Permitting and Standards

JB/TH/bjb

cc: Kenneth Given, P.E  
Charles Collins, Central District



P 872 562 593



### Receipt for Certified Mail

No Insurance Coverage Provided  
Do not use for International Mail  
(See Reverse)

PS Form 3800, JUNE 1991

Sent to Mr. Aaron P. Corkum, Coca-	
Street and No. Cola Foods	
P. O. Box 490720	
P.O., State and ZIP Code Leesburg, FL 34749-0720	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date Mailed: 1-18-94 Permit: A035-153889	

Is your RETURN ADDRESS completed on the reverse side?

#### SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

- Addressee's Address
- Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to: Mr. Aaron P. Corkum Environmental Coordinator Coca-Cola Foods P. O. Box 290730 Leesburg, FL 34749-0720	4a. Article Number P 872 562 593
	4b. Service Type <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise
5. Signature (Addressee)	7. Date of Delivery 1-21-94
6. Signature (Agent) 	8. Addressee's Address (Only if requested and fee is paid)

PS Form 3811, December 1991 U.S. GPO: 1992-323-402

DOMESTIC RETURN RECEIPT

Thank you for using Return Receipt Service.



Lawton Chiles  
Governor

# Florida Department of Environmental Protection

Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Virginia B. Wetherell  
Secretary

January 18, 1994

## CERTIFIED MAIL-RETURN RECEIPT

Mr. Aaron P. Corkum  
Environmental Coordinator  
Coca-Cola Foods  
P. O. Box 490730  
Leesburg, Florida 34749-0720

Dear Mr. Corkum:

RE: Coca-Cola Foods, Leesburg  
Permit No. A035-153889, Request for Permit Amendment

The Bureau of Air Regulation received your request for the above referenced project. On October 30, 1991, Rule 17-4.050(4)(o), F.A.C., was changed to require a \$250 processing fee for a permit amendment; therefore, we will not be able to take action on your request until the fee is received. If you have any questions, please call Patty Adams at (904)488-1344.

Sincerely,

A handwritten signature in cursive script that reads "Patty Adams".

*for* C. H. Fancy, P.E.  
Chief

Bureau of Air Regulation

CHF/pa

cc: Kenneth E. Given, P.E.  
Teresa Heron



Department of Environmental PROTECTION  
**Routing and Transmittal Slip**

To: (Name, Office, Location)

1. DEPT. OF  
PRESTON LEWIS, AIR RESOURCES MGT, TALLAHASSEE
- 2.
3. *Patty*
4. *Assign to Lewis when it arrives Puerto*

Remarks:

PRESTON - attached is a copy of a request for <sup>12/1/93</sup>  
changes to an Ac (and Ad) for Coca-Cola Foods,  
which will be submitted by their P.E., Ken  
Given, of Stevenson and Associates.

I am sending this to your attention  
in advance so as to allow as much time as  
possible for review. The permittee has waived  
the 90 day clock until March 4, 1994. am.

Please let me know if there are  
any questions. Fee if Const need mod  
draft for fee if open permit  
need mod

From

LOUIS BROWN

Date

12-8-93

Phone

SC325-1347

4. Emissions testing for NO<sub>x</sub>, SO<sub>2</sub>, and VE shall be done at yearly intervals.
9. The plant's other operating permits were modified to limit total NO<sub>x</sub>, SO<sub>2</sub>, and particulate emissions.

Coca-Cola Foods requests that the following modifications be made to this permit upon renewal:

1. No. 2 fuel oil is permitted to be burned as an alternative fuel to natural gas in the turbine. It is permitted at the full firing rate of 342 GPH, but only for 50 hours/year. Coca-Cola Foods requests that the maximum hours be increased to 400 hours/year. This will allow them to fire the system on No. 2 fuel oil periodically to insure the proper operation of fuel oil system during gas curtailment.
2. No. 6 fuel oil is permitted to be burned as an alternative fuel to natural gas in the auxiliary duct burner. It is permitted at 119 GPH for up to 600 hours/year. Coca-Cola Foods requests that the permitted firing rate be increased to 609 GPH. The present limit of 119 GPH will supply 17.85 MMBTU/hour. The requested rate of 609 GPH will allow the duct burner to be run at the full firing rate of 91.36 MMBTU/hour which will allow full steam generation.

CT x  
4.2 TPY

50-400 HRS  
 342 GPH  
 0.5% S

x  
35 TPY

WHB  
 600 HRS/YR  
 119 GPH - 609 GPH  
 #6 1.5% S

Upon review of the 1987 permit application, it was noted that No. 6 fuel oil consumption was listed at 199 GPH with a maximum heat input of 101.19 MMBTU/hour. At 152,000 BTU/Gal for No. 6 fuel oil, this would give off 666 GPH. The 199 GPH apparently was a mistake. It also appears that the permitted rate of 119 GPH may have been a typo and should have been 199 GPH.

$$199 \frac{\text{gal}}{\text{hr}} \times 152,000 \frac{\text{BTU}}{\text{gal}} = 30.2 \text{ MMBTU/hr}$$

3. Specific condition No. 4 requires yearly testing for SO<sub>2</sub>, NO<sub>x</sub>, and visible emissions (VE). Due to the expense of the NO<sub>x</sub> test and the successful testing during the past five years, Coca-Cola Foods requests that NO<sub>x</sub> testing not be required yearly but only upon permit renewal. SO<sub>2</sub> emissions can still be determined by calculations based on fuel analysis (ASTMD 1552) for sulfur content. VE testing can be performed on a yearly basis.

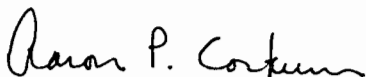
As part of the review of the original permit application, a BACT Determination (see attachments) was made concerning SO<sub>2</sub> and particulate matter (PM) emissions. The Determination limited the No. 6 fuel oil to 1.5% sulfur by weight and the No. 2 fuel oil to 0.5% sulfur by weight. Also, specific condition No. 9 modified the other plant permits to limit the total SO<sub>2</sub>, NO<sub>x</sub>, and particulate emissions. At that time Coca-Cola Foods had three boilers, Nos. 2, 3, and 4 which were replaced by a new boiler No. 4 in 1991. Boilers Nos. 2, 3, and 4 could be fired on fuel oil while new Boiler No. 4 fires natural gas only.

The BACT Determination was based on total emissions which allowed burning of fuel oil in the three boilers. **Table I. Coca-Cola Foods, Leesburg - Permitted Emissions** lists each permit and its permitted emission amounts for SO<sub>2</sub>, NO<sub>x</sub>, and PM. Included are the plant's total permitted emissions as well as those reported in the 1992 Annual Operation Report. **Table IA. Coca-Cola Foods, Leesburg - Emissions Summary** lists the amounts proposed for the permit renewal/modification and the plant totals if the modification is approved. Based on the modification requested, the total permitted SO<sub>2</sub>, NO<sub>x</sub>, and PM emissions will be lower than the permitted amounts based on the BACT Determination.

As a Title V source, Coca-Cola Foods is not required to pay fees for permit modifications. If you have any questions concerning this renewal/modification please call me at (904) 728-7800 or Kenneth E. Given, P.E. at (813) 651-0878.

Sincerely,

**COCA-COLA FOODS**



Aaron P. Corkum,  
Environmental Coordinator  
Leesburg Plant

Copy: William P. Jones  
Kenneth E. Given, P.E.

**TABLE I. COCA COLA FOODS, LEESBURG  
PERMITTED EMSSIONS**

Permit No.	Permit	1992	Permit	1992	Permit	1992
		A035-195445		A035-225150		A035-203387
Unit	Dryer/WHE		Cooling Reel		<del>Boiler</del>	
Exp. Date	6/25/96		4/30/98		11/30/96	
Hours/yr	8760	2209	8760	2209	8760	478
Tons/yr	457,535	83,667	122,640	26,421	-	-
SO <sub>2</sub> , TPY	16 ✓	<u>3.2</u>	- ✓	-	<u>72</u>	-
NO <sub>x</sub> , TPY	37.5 ✓	7.5	-	-	<u>43.33</u>	1.8
PM, TPY	118.6 ✓	17.4	55.8 ✓	1.4	<u>8.1</u>	0
No.6, MGal/yr	* 81.2	16	-	-	-	-
Hours/yr	-	35	-	-	-	-
No.2, MGal/yr	-	-	-	-	-	-
Hours/yr	-	-	-	-	-	-

Permit No.	Permit	1992	Permit	1992
		A035-153889		
Unit	Turbine/Boiler		Totals	
Exp. Date	3/8/94 <i>actual</i>			
Hours/yr	8760	<u>8064</u>		
Tons/yr	-	-	-	-
SO <sub>2</sub> , TPY	<i>gas</i> 0.05 <i>oil</i> 0.31	0.1	<i>97.28</i>	3.3
NO <sub>x</sub> , TPY	<i>gas</i> 91.8 <i>oil</i> 0.8	59.6 <i>1.13</i>	<u>172.3</u>	68.9
PM, TPY	-	0.7	182.4	19.5
No.6, MGal/yr	** 71.4	0	152.6	16
Hours/yr	600	0	-	35
No.2, MGal/yr	17.1	0	-	-
Hours/yr	50	0	-	-

\* No.6 fuel oil @ 2.5% S

\*\* No.6 fuel oil @ 1.5% S

° A035-99125 - Boilers No. 2, 3, 4 replaced with new boiler No.4 using gas only

*Want to know*  
SO<sub>2</sub> 29.48 TPY  
NO<sub>x</sub> 6  
SO<sub>2</sub> Turbine 0.31 TPY

*1.8 TPY 478 hrs*

*7.53*

*1991*

*actual*  
*94*  
*0*

TABLE IA. COCA COLA FOODS, LEESBURG  
EMISSIONS SUMMARY

	Permit	Proposed	Permitted	Proposed
Permit No.	A035-153889	-	-	-
Unit	Turbine/Boiler		Plant Totals	
Exp. Date	3/8/94	-	-	-
Hours/yr	8760	8760	8760	8760
Tons/yr	-	#22	391	-
SO <sub>2</sub> , TPY	26 (92)	+39 (48)	26 + 39 = 65	65
NO <sub>x</sub> , TPY	91.8	+0	172.3	129.3
PM, TPY	-	+0	182.4	174.4
No.6, MGal/yr	** 71.4	365.4	152.6	446.6
Hours/yr	600	600	600	600
No.2, MGal/yr	17.1	136.8	17.1	136.8
Hours/yr	50	400	50	400

\*\* No.6 fuel oil @ 1.5% S

SO<sub>2</sub>  
97 -  
65  
34  
1991

9  
39 +  
48

SO<sub>2</sub> Proposed  
16 Days  
1 boiler  
48 new increase  
65

1 boiler  
16 Days  
9 Turbine & boiler  
26TPY permitted

1987

1991

reduction 97 -  
20TPY

97 -  
65



**TABLE II. POTENTIAL EMISSIONS**

(Emission Factors Taken From Source Classification Codes)

**TURBINE**

Natural Gas - SCC - 2-01-002-01 (8360 Hours/Year)

<b><u>POLLUTANT</u></b>	<b><u>MMCFH</u></b>	<b><u>LBS/MMCF</u></b>	<b><u>LBS/HOUR</u></b>	<b><u>TONS/YEAR</u></b>
PM	0.043	14.0	0.60	2.52
SO <sub>2</sub>	0.043	0.6	0.03	0.10
NO <sub>x</sub>	0.043	413.0	17.76	74.23
VOC	0.043	12.6	0.54	2.26
CO	0.043	115.0	4.95	20.67

No.2 Fuel Oil - SCC - 2-01-001-01 (Maximum - 400 Hours/Year)

<b><u>POLLUTANT</u></b>	<b><u>MGPH</u></b>	<b><u>LBS/MGAL</u></b>	<b><u>LBS/HOUR</u></b>	<b><u>TONS/YEAR</u></b>
PM	0.342	5.0	1.71	0.34
SO <sub>2</sub>	0.342	140x0.5	23.94	4.79
NO <sub>x</sub>	0.342	67.8	23.19	4.64
VOC	0.342	4.77	1.63	0.33
CO	0.342	15.4	5.27	1.05

**AUXILIARY DUCT BURNER**

Natural Gas - SCC - 1-0-02-006-02 (8160 Hours/Year)

<b><u>POLLUTANT</u></b>	<b><u>MMCFH</u></b>	<b><u>LBS/MMCF</u></b>	<b><u>LBS/HOUR</u></b>	<b><u>TONS/YEAR</u></b>
PM	0.087	3.0	0.26	1.06
SO <sub>2</sub>	0.087	0.6	0.05	0.21
NO <sub>x</sub>	0.087	140.0	12.18	49.69
VOC	0.087	2.8	0.24	0.99
CO	0.087	35.0	3.05	12.42

No.6 Fuel Oil - SCC - 1-02-004-01 (Maximum - 600 Hours/Year)

<b><u>POLLUTANT</u></b>	<b><u>MGPH</u></b>	<b><u>LBS/MGAL</u></b>	<b><u>LBS/HOUR</u></b>	<b><u>TONS/YEAR</u></b>
PM	0.609	12x1.5	10.96	3.29
SO <sub>2</sub>	0.609	158.6x1.5	144.88	43.46
NO <sub>x</sub>	0.609	55.0	33.5	10.05
VOC	0.609	0.28	0.17	0.05
CO	0.609	5.0	3.05	0.91
Pb	0.609	0.0042	0.0	0.0

**TABLE III. EMISSION LIMITATIONS**

Combined Cycle Gas Turbine Generator and Auxiliary Duct Burner

**40 CFR Part 60 Subpart GG**  
**Standards of Performance for Stationary Gas Turbines**

\* Allowable emissions:  $\text{NO}_x = 168 \text{ ppmv}$   
 $\text{SO}_2 = 150 \text{ ppmv}$

\* Turbine exhaust gas flow = 24,000 DSCFM

$\text{NO}_x = 24,000 \text{ CF/min} \times 60 \text{ min/hr} \times 46 \text{ lbs/lb}\cdot\text{mole} \times \text{lb}\cdot\text{mole}/385 \text{ CF} \times$   
 $168 \text{ ppmv} \times 10^{-6}$

= 28.9 lbs/hr x 8760 hrs/yr x Ton/2000 lbs

= 126.6 Tons/yr

$\text{SO}_2 = 24,000 \text{ CF/min} \times 60 \text{ min/hr} \times 64 \text{ lbs/lb}\cdot\text{mole} \times \text{lb}\cdot\text{mole}/385 \text{ CF} \times$   
 $150 \text{ ppmv} \times 10^{-6}$

= 35.9 lbs/hr x 8760 hrs/yr x Ton/2000 lbs

= 157.2 Tons/yr

**BACT Emission Limitation**

**PRESENT**

**SO<sub>2</sub>**

Turbine - No.2 fuel oil @ 0.5% sulfur

$\text{SO}_2 = 342 \text{ gal/hr} \times 7.05 \text{ lbs/gal} \times 0.005 \text{ S} \times 2 \text{ SO}_2/\text{S}$

= 24.11 lbs/hr x 50 hrs/yr x Ton/2000 lbs

= 0.6 Tons/yr

Auxiliary Duct Burner - No.6 fuel oil @ 1.5% sulfur

$\text{SO}_2 = 119 \text{ gal/hr} \times 7.88 \text{ lbs/gal} \times 0.015 \text{ S} \times 2 \text{ SO}_2/\text{S}$

= 28.13 lbs/hr x 600 hrs/yr x Ton/2000 lbs

= 8.44 Tons/yr

**PROPOSED**

Turbine - No.2 fuel oil @ 0.5% sulfur

$$\begin{aligned} \text{SO}_2 &= 342 \text{ gal/hr} \times 7.05 \text{ lbs/gal} \times 0.005 \text{ S} \times 2 \text{ SO}_2/\text{S} \\ &= 24.11 \text{ lbs/hr} \times 400 \text{ hrs/yr} \times \text{Ton}/2000 \text{ lbs} \\ &= 4.82 \text{ Tons/yr} \end{aligned}$$

Auxiliary Duct Burner - No.6 fuel oil @ 1.5% sulfur

$$\begin{aligned} \text{SO}_2 &= 609 \text{ gal/hr} \times 7.88 \text{ lbs/gal} \times 0.015 \text{ S} \times 2 \text{ SO}_2/\text{S} \\ &= 143.97 \text{ lbs/hr} \times 600 \text{ hrs/yr} \times \text{Ton}/2000 \text{ lbs} \\ &= 43.19 \text{ Tons/yr} \end{aligned}$$

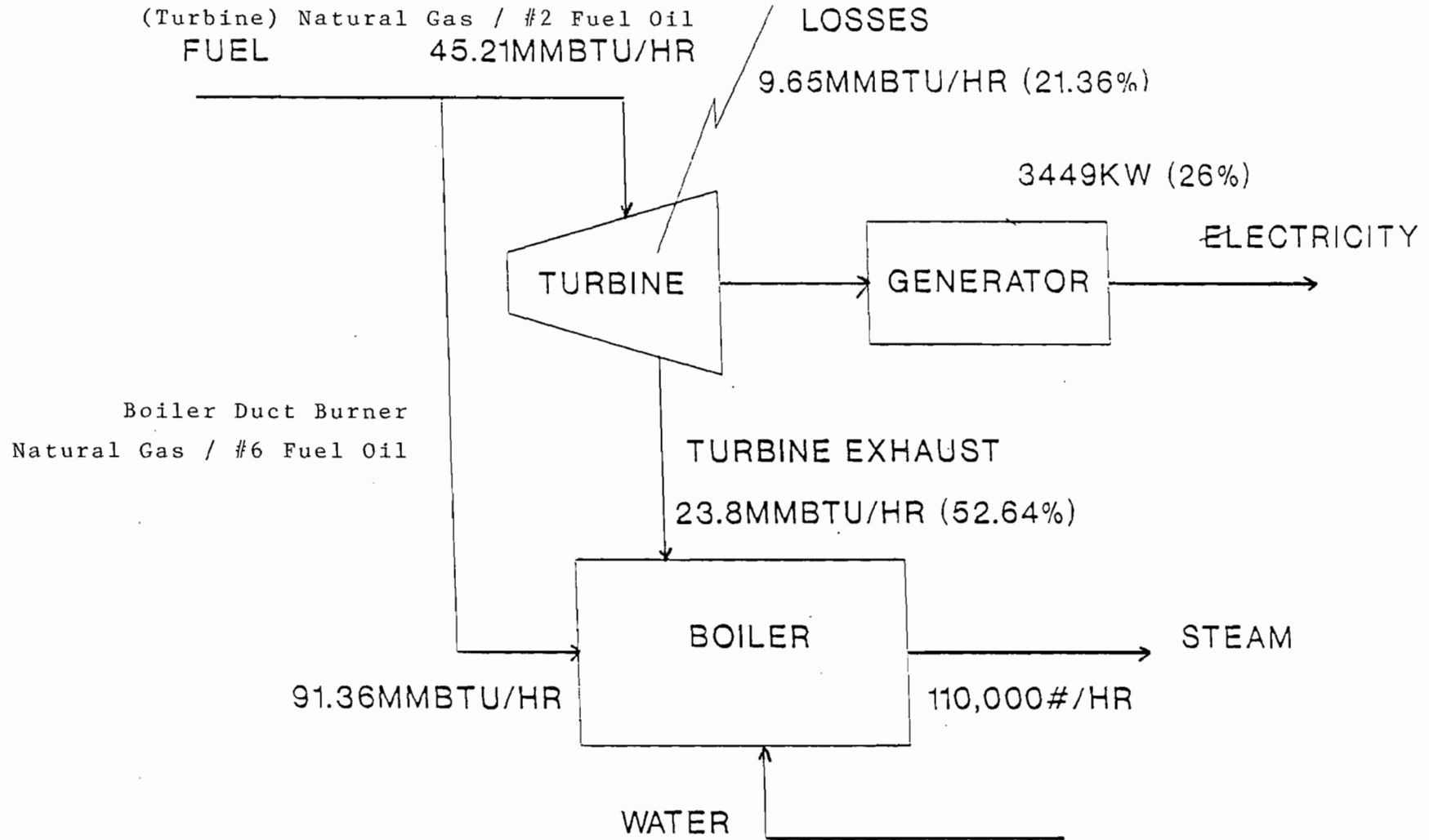
Total SO<sub>2</sub>:

	<u>Present</u>		<u>Proposed</u>	
<u>UNIT</u>	<u>lbs/hr</u>	<u>Tons/yr</u>	<u>lbs/hr</u>	<u>Tons/yr</u>
Turbine	24.11	0.6	24.11	4.82
Duct Burner	28.13	8.44	143.97	43.19
Totals	52.24	9.04	168.08	48.01

73.19  
 8.44  
 -----  
 34.75

20  
 17

# CO-GEN MINIMUM PERFORMANCE



Best Available Control Technology (BACT) Determination  
Coca-Cola Foods  
Lake County

The applicant plans to install one waste heat process steam boiler at their facility in Leesburg, Florida, in conjunction with a natural gas-fired turbine generator. The turbine will fire only natural gas. Diesel fuel No. 2 may be fired for up to 50 hours in any 12 month period. The applicant also plans to install an auxiliary gas-fired burner in the waste heat boiler duct to generate additional steam. This BACT determination is addressed only to the auxiliary duct burner. The burner will fire only natural gas except during curtailment when No. 6 fuel oil may be fired for up to 600 hours per year.

This BACT determination is required for the source as set forth in the Florida Administrative Code Rule 17-2.600(6) - Emission Limiting and Performance Standards.

BACT Determination Requested by the Applicant:

Use of high efficiency burners fired by natural gas constitutes the best available technology for this project. The applicant requested that No. 6 fuel oil with a sulfur content of up to 2.4 percent be used in case of natural gas curtailment for the auxiliary duct burner.

→ BACT Determination by DER:

The amount of particulate and sulfur dioxide emissions from the boiler will be limited by the firing of natural gas except during periods of curtailment when No. 6 fuel oil having a sulfur content not to exceed 1.5 percent, by weight, may be fired for up to 600 hours in any 12 month period.

Visible Emissions

Not to exceed 15 percent opacity.

DER Method 9 (17-2.700(6)(a)9, FAC) will be used to determine compliance with the opacity standard.

BACT Determination Rationale:

Sulfur in fuel is a primary air pollution concern. Most of the sulfur becomes SO<sub>2</sub> when the fuel is burned. Particulate emissions from fuel burning are related to the sulfur content of the fuel. The Department agrees with the applicant's proposal that the firing of natural gas is BACT for the auxiliary duct burner. However, the No. 6 fuel oil sulfur content proposed by the applicant does not constitute BACT. A review of BACT determinations made for similar proposals indicates that a No. 6 fuel oil sulfur content not to exceed 1.5 percent is generally deemed as BACT based on cost/benefit analyses. ✓

Details of the Analysis May be Obtained by Contacting:

Barry Andrews, P.E. BACT Coordinator  
Department of Environmental Regulation  
Bureau of Air Quality Management  
2600 Blairstone Road  
Tallahassee, Florida 32399-2400

Recommended by:




C. H. Fancy, P.E.  
Deputy Bureau Chief, BAQM

1/14/88

Date

Approved by



Dale Twachtmann, Secretary

15 Jan 88  
Date



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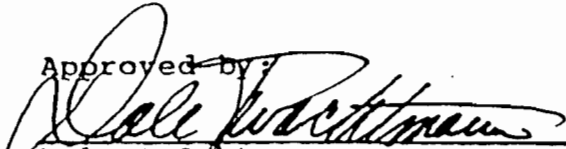


\_\_\_\_\_  
C. H. Fancy, P.E.  
Deputy Bureau Chief, BAQM

1/14/88

Date

Approved by:

  
\_\_\_\_\_  
Dale Twachtmann, Secretary

15 Jan 88  
Date





Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

DER Form # \_\_\_\_\_
Form Title \_\_\_\_\_
Effective Date \_\_\_\_\_
DER Application No. \_\_\_\_\_ (Filed in by DER)

APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: Combined Cycle Gas Turbine [ ] New<sup>1</sup> [X] Existing<sup>1</sup>

APPLICATION TYPE: [ ] Construction [ ] Operation [X] Modification

COMPANY NAME: COCA COLA FOODS COUNTY: LAKE

Identify the specific emission point source(s) addressed in this application (i.e. Lime Kiln No. 4 with Venturi Scrubber; Peaking Unit No. 2, Gas Fired) Turbine/Boiler Exhaust

SOURCE LOCATION: Street Cloud St. and US 441 City Leesburg

UTM: East 17-415.5 North 3187.3

Latitude 28° 49' 54" N Longitude 81° 49' 50" W

APPLICANT NAME AND TITLE: William P. Jones / Plant Manager

APPLICANT ADDRESS: P.O.Box 490720 Leesburg, FL. 32749-0720

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

I am the undersigned owner or authorized representative\* of Coca Cola Foods

I certify that the statements made in this application for a modification of permit are true, correct and complete to the best of my knowledge and belief. Further, I agree to maintain and operate the pollution control source and pollution control facilities in such a manner as to comply with the provision of Chapter 403, Florida Statutes, and all the rules and regulations of the department and revisions thereof. I also understand that a permit, if granted by the department, will be non-transferable and I will promptly notify the department upon sale or legal transfer of the permitted establishment.

\*Attach letter of authorization

Signed: [Signature]

William P. Jones / Plant Manager
Name and Title (Please Type)

Date: 9/1/83 Telephone No. (904) 728-7800

B. PROFESSIONAL ENGINEER REGISTERED IN FLORIDA (where required by Chapter 471, F.S.)

This is to certify that the engineering features of this pollution control project have been designed/examined by me and found to be in conformity with modern engineering principles applicable to the treatment and disposal of pollutants characterized in the permit application. There is reasonable assurance, in my professional judgment, that

1 See Florida Administrative Code Rule 17-2.100(57) and (104)

the pollution control facilities, when properly maintained and operated, will discharge an effluent that complies with all applicable statutes of the State of Florida and the rules and regulations of the department. It is also agreed that the undersigned will furnish, if authorized by the owner, the applicant a set of instructions for the proper maintenance and operation of the pollution control facilities and, if applicable, pollution sources.



Signed Kenneth E. Given

Kenneth E. Given  
Name (Please Type)

Stevenson and Associates  
Company Name (Please Type)

333 Falkenburg Rd., B-214 Tampa, FL 33619  
Mailing Address (Please Type)

Florida Registration No. 23203 Date: 8/25/93 Telephone No. (813) 651-0878

**SECTION III: GENERAL PROJECT INFORMATION**

A. Describe the nature and extent of the project. Refer to pollution control equipment, and expected improvements in source performance as a result of installation. State whether the project will result in full compliance. Attach additional sheet if necessary.

Modification requests that the hours of use of #2 F.O. as an alternative fuel for the gas turbine be increased to 400 hours per year, and that the use of #6 F.O. in the auxiliary duct burner as an alternative fuel be increased to the full firing rate of 609 GPH.

B. Schedule of project covered in this application (Construction Permit Application Only)

Start of Construction \_\_\_\_\_ Completion of Construction \_\_\_\_\_

C. Costs of pollution control system(s): (Note: Show breakdown of estimated costs only for individual components/units of the project serving pollution control purposes. Information on actual costs shall be furnished with the application for operation permit.)

N/A

D. Indicate any previous DER permits, orders and notices associated with the emission point, including permit issuance and expiration dates.

A035-153889 - issued 3/15/89, expires 3/8/94

E. Requested permitted equipment operating time: hrs/day 24 ; days/wk 7 ; wks/yr 52 ;  
 if power plant, hrs/yr \_\_\_\_\_ ; if seasonal, describe: \_\_\_\_\_  
Turbine generator operates full time; auxiliary duct burner operates as  
needed depending on steam requirements, but mostly during fruit  
processing season when steam load is high

F. If this is a new source or major modification, answer the following questions.  
 (Yes or No)

1. Is this source in a non-attainment area for a particular pollutant? no

a. If yes, has "offset" been applied? \_\_\_\_\_

b. If yes, has "Lowest Achievable Emission Rate" been applied? \_\_\_\_\_

c. If yes, list non-attainment pollutants. \_\_\_\_\_

2. Does best available control technology (BACT) apply to this source?  
 If yes, see Section VI. yes

3. Does the State "Prevention of Significant Deterioration" (PSD)  
 requirement apply to this source? If yes, see Sections VI and VII. no

4. Do "Standards of Performance for New Stationary Sources" (NSPS)  
 apply to this source? yes

5. Do "National Emission Standards for Hazardous Air Pollutants"  
 (NESHAP) apply to this source? no

ii. Do "Reasonably Available Control Technology" (RACT) requirements apply  
 to this source? no

a. If yes, for what pollutants? \_\_\_\_\_

b. If yes, in addition to the information required in this form,  
 any information requested in Rule 17-2.650 must be submitted.

Attach all supportive information related to any answer of "Yes". Attach any justifi-  
 cation for any answer of "No" that might be considered questionable.

**SECTION III: AIR POLLUTION SOURCES & CONTROL DEVICES (Other than Incinerators)**

**A. Raw Materials and Chemicals Used in your Process, if applicable:**

Description	Contaminants		Utilization Rate - lbs/hr	Relate to Flow Diagram
	Type	% Wt		

**B. Process Rate, if applicable: (See Section V, Item 1) N/A**

1. Total Process Input Rate (lbs/hr): \_\_\_\_\_

2. Product Weight (lbs/hr): \_\_\_\_\_

**C. Airborne Contaminants Emitted: (Information in this table must be submitted for each emission point, use additional sheets as-necessary)**

Name of Contaminant	Emission <sup>1</sup>		Allowed Emission Rate per Rule 17-2	Allowable <sup>3</sup> Emission lbs/hr	Potential <sup>4</sup> Emission		Relate to Flow Diagram
	Maximum lbs/hr	Actual T/yr			lbs/yr	T/yr	
PM	-	-	17-296.330	15% opacity	-	-	
NOx	28.9	126.6	17-296.800	28.9	28.9	126.6	
*SO <sub>2</sub>	24.11	4.82	17-296.800	35.9	24.11	4.82	
**SO <sub>2</sub>	144	43.19	17-296.800	144	144	42.19	
see Table II and Table III							

<sup>1</sup>See Section V, Item 2. \* stationary gas turbine \*\* auxiliary duct burner

<sup>2</sup>Reference applicable emission standards and units (e.g. Rule 17-2.600(5)(b)2. Table II, E. (1) - 0.1 pounds per million BTU heat input)

<sup>3</sup>Calculated from operating rate and applicable standard.

<sup>4</sup>Emission, if source operated without control (See Section V, Item 3).

D. Control Devices (See Section V, Item 4)

Name and Type (Model & Serial No.)	Contaminant	Efficiency	Range of Particles Size Collected (in microns) (if applicable)	Boiler for Efficiency (Section V Item 5)

E. Fuels

Type (Be Specific)	Consumption*		Maximum Heat Input (MMBTU/hr)
	avg/hr	max./hr	
Turbine - natural gas	0.043	0.043 MMCF	45.21
(alternative) #2 F.O.	342 Gal.	342 Gal.	45.21
Duct Burner - Nat. Gas	on demand	0.087 MMCF	91.36
(alternative) #6 F.O.	on demand	609 Gal.	91.36

\*Units: Natural Gas--MMCF/hr; Fuel Oil--gallons/hr; Coal, wood, refuse, other--lbs/hr.

Fuel Analysis: N.G. (#2 F.O.) (#6 F.O.)

Percent Sulfur: nil (0.5) (1.5) Percent Ash: 0 (neg.) (0.1)  
 Density: 0.047 lbs/CF (7.05) (7.88) lbs/gal Typical Percent Nitrogen: 5 (0.02) (neg.)  
 Heat Capacity: 1050 Btu/CF (19.9) (18) M BTU/lb 1050 Btu/CF (140) (150) M BTU/gal  
 Other Fuel Contaminants (which may cause air pollution): \_\_\_\_\_

F. If applicable, indicate the percent of fuel used for space heating.

Annual Average est. 0.8% Maximum est. 1%

G. Indicate liquid or solid wastes generated and method of disposal.

Boiler blowdown sent to wastewater treatment system

II. Emission Stack Geometry and Flow Characteristics (Provide data for each stack):

Stack Height: 40 ft. Stack Diameter: 4 ft.  
 Gas Flow Rate: 40,100 ACFM 23,900 DSCFM Gas Exit Temperature: 360 °F.  
 Water Vapor Content: 9.5 % Velocity: 56 FPS

SECTION IV: INCINERATOR INFORMATION  
 N/A

Type of Waste	Type 0 (Plastics)	Type I (Rubbish)	Type II (Refuse)	Type III (Garbage)	Type IV (Pathological)	Type V (Liq. & Gas By-prod.)	Type VI (Solid By-prod.)
Actual lb/hr Incinerated							
Uncontrolled (lb/hr)							

Description of Waste \_\_\_\_\_

Total Weight Incinerated (lbs/hr) \_\_\_\_\_ Design Capacity (lbs/hr) \_\_\_\_\_

Approximate Number of Hours of Operation per day \_\_\_\_\_ day/wk \_\_\_\_\_ wks/yr. \_\_\_\_\_

Manufacturer \_\_\_\_\_

Date Constructed \_\_\_\_\_ Model No. \_\_\_\_\_

	Volume (ft) <sup>3</sup>	Heat Release (BTU/hr)	Fuel		Temperature (°F)
			Type	BTU/hr	
Primary Chamber					
Secondary Chamber					

Stack Height: \_\_\_\_\_ ft. Stack Diameter: \_\_\_\_\_ Stack Temp. \_\_\_\_\_

Gas Flow Rate: \_\_\_\_\_ ACFM \_\_\_\_\_ DSCFM\* Velocity: \_\_\_\_\_ FPS

\*If 50 or more tons per day design capacity, submit the emissions rate in grains per standard cubic foot dry gas corrected to 50% excess air.

Type of pollution control device:  Cyclone  Wet Scrubber  Afterburner  
 Other (specify) \_\_\_\_\_

Brief description of operating characteristics of control devices: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Ultimate disposal of any effluent other than that emitted from the stack (scrubber water, ash, etc.):

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

NOTE: Items 2, 3, 4, 6, 7, 8, and 10 in Section V must be included where applicable.

**SECTION V: SUPPLEMENTAL REQUIREMENTS**

Please provide the following supplements where required for this application.

1. Total process input rate and product weight -- show derivation [Rule 17-2.100(127)]
2. In a construction application, attach basis of emission estimate (e.g., design calculations, design drawings, pertinent manufacturer's test data, etc.) and attach proposed methods (e.g., FR Part 60 Methods 1, 2, 3, 4, 5) to show proof of compliance with applicable standards. In an operation application, attach test results or methods used to show proof of compliance. Information provided when applying for an operation permit from a construction permit shall be indicative of the time at which the test was made.
3. Attach basis of potential discharge (e.g., emission factor, that is, AP42 test).
4. With construction permit application, include design details for all air pollution control systems (e.g., for baghouse include cloth to air ratio; for scrubber include cross-section sketch, design pressure drop, etc.)
5. With construction permit application, attach derivation of control device(s) efficiency. Include test or design data. Items 2, 3 and 5 should be consistent: actual emissions = potential (1-efficiency).
6. An 8 1/2" x 11" flow diagram which will, without revealing trade secrets, identify the individual operations and/or processes. Indicate where raw materials enter, where solid and liquid waste exit, where gaseous emissions and/or airborne particles are evolved and where finished products are obtained.
7. An 8 1/2" x 11" plot plan showing the location of the establishment, and points of airborne emissions, in relation to the surrounding area, residences and other permanent structures and roadways (Example: Copy of relevant portion of USGS topographic map).
8. An 8 1/2" x 11" plot plan of facility showing the location of manufacturing processes and outlets for airborne emissions. Relate all flows to the flow diagram.

9. The appropriate application fee in accordance with Rule 17-4.05. The check should be made payable to the Department of Environmental Regulation.
10. With an application for operation permit, attach a Certificate of Completion of Construction indicating that the source was constructed as shown in the construction permit.

**SECTION VI: BEST AVAILABLE CONTROL TECHNOLOGY**

A. Are standards of performance for new stationary sources pursuant to 40 C.F.R. Part 60 applicable to the source?

Yes  No

Contaminant	Rate or Concentration
SO <sub>2</sub>	150 ppmv
NO <sub>x</sub>	168 ppmv

B. Has EPA declared the best available control technology for this class of sources (if yes, attach copy)

Yes  No See attached BACT Determination

Contaminant	Rate or Concentration

C. What emission levels do you propose as best available control technology?

Contaminant	Rate or Concentration
PM	VE - 15%
SO <sub>2</sub>	#2 F.O. - 0.5% S, #6 F.O. - 1.5% S
NO <sub>x</sub>	168 ppmv

D. Describe the existing control and treatment technology (if any). N/A

- |                           |                          |
|---------------------------|--------------------------|
| 1. Control Device/System: | 2. Operating Principles: |
| 3. Efficiency:            | 4. Capital Costs:        |

\*Explain method of determining



5. Useful Life:

6. Operating Costs:

7. Energy:

8. Maintenance Cost:

9. Emissions:

Contaminant	Rate or Concentration

10. Stack Parameters

- a. Height: ft.      b. Diameter: ft.
- c. Flow Rate: ACFM      d. Temperature: °F.
- e. Velocity: FPS

E. Describe the control and treatment technology available (As many types as applicable, use additional pages if necessary).

N/A

1.

- a. Control Device: b. Operating Principles:
- c. Efficiency:<sup>1</sup> d. Capital Cost:
- e. Useful Life: f. Operating Cost:
- g. Energy:<sup>2</sup> h. Maintenance Cost:
- i. Availability of construction materials and process chemicals:
- j. Applicability to manufacturing processes:
- k. Ability to construct with control device, install in available space, and operate within proposed levels:

2.

- a. Control Device: b. Operating Principles:
- c. Efficiency:<sup>1</sup> d. Capital Cost:
- e. Useful Life: f. Operating Cost:
- g. Energy:<sup>2</sup> h. Maintenance Cost:
- i. Availability of construction materials and process chemicals:

<sup>1</sup>Explain method of determining efficiency.

<sup>2</sup>Energy to be reported in units of electrical power - KWII design rate.

j. Applicability to manufacturing processes:

k. Ability to construct with control device, install in available space, and operate within proposed levels:

l.

n. Control Device:

b. Operating Principles:

c. Efficiency:<sup>1</sup>

d. Capital Cost:

e. Useful Life:

f. Operating Cost:

g. Energy:<sup>2</sup>

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

j. Applicability to manufacturing processes:

k. Ability to construct with control device, install in available space, and operate within proposed levels:

l.

n. Control Device:

b. Operating Principles:

c. Efficiency:<sup>1</sup>

d. Capital Costs:

e. Useful Life:

f. Operating Cost:

g. Energy:<sup>2</sup>

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

j. Applicability to manufacturing processes:

k. Ability to construct with control device, install in available space, and operate within proposed levels:

F. Describe the control technology selected: N/A

1. Control Device:

2. Efficiency:<sup>1</sup>

3. Capital Cost:

4. Useful Life:

5. Operating Cost:

6. Energy:<sup>2</sup>

7. Maintenance Cost:

8. Manufacturer:

9. Other locations where employed on similar processes:

a. (1) Company:

(2) Mailing Address:

(3) City:

(4) State:

<sup>1</sup> Explain method of determining efficiency.

<sup>2</sup> Energy to be reported in units of electrical power - KW design rate.

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:<sup>1</sup>

Contaminant

Rate or Concentration

\$

(8) Process Rate:<sup>1</sup>

b. (1) Company:

(2) Mailing Address:

(3) City:

(4) State:

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:<sup>1</sup>

Contaminant

Rate or Concentration

(8) Process Rate:<sup>1</sup>

10. Reason for selection and description of systems:

<sup>1</sup>Applicant must provide this information when available. Should this information not be available, applicant must state the reason(s) why.

**SECTION VII - PREVENTION OF SIGNIFICANT DETERIORATION**

**A. Company Monitored Data**

1. \_\_\_\_\_ no. sites \_\_\_\_\_ ISP \_\_\_\_\_ ( ) SO<sub>2</sub>\* \_\_\_\_\_ Wind spd/dir

Period of Monitoring \_\_\_\_\_ / \_\_\_\_\_ / \_\_\_\_\_ to \_\_\_\_\_ / \_\_\_\_\_ / \_\_\_\_\_  
month day year month day year

Other data recorded \_\_\_\_\_

Attach all data or statistical summaries to this application.

\*Specify bubbler (B) or continuous (C).

2. Instrumentation, Field and Laboratory

a. Was instrumentation EPA referenced or its equivalent?  Yes  No

b. Was instrumentation calibrated in accordance with Department procedures?  
 Yes  No  Unknown

B. Meteorological Data Used for Air Quality Modeling

1. \_\_\_\_\_ Year(s) of data from \_\_\_\_\_ / \_\_\_\_\_ / \_\_\_\_\_ to \_\_\_\_\_ / \_\_\_\_\_ / \_\_\_\_\_  
month day year month day year

2. Surface data obtained from (location) \_\_\_\_\_

3. Upper air (mixing height) data obtained from (location) \_\_\_\_\_

4. Stability wind rose (SIAR) data obtained from (location) \_\_\_\_\_

C. Computer Models Used

1. \_\_\_\_\_ Modified? If yes, attach description.

2. \_\_\_\_\_ Modified? If yes, attach description.

3. \_\_\_\_\_ Modified? If yes, attach description.

4. \_\_\_\_\_ Modified? If yes, attach description.

Attach copies of all final model runs showing input data, receptor locations, and principle output tables.

D. Applicants Maximum Allowable Emission Data

Pollutant	Emission Rate
TSP	_____ grams/sec
SO <sub>2</sub>	_____ grams/sec

E. Emission Data Used in Modeling

Attach list of emission sources. Emission data required is source name, description of point source (on NEDS point number), UTM coordinates, stack data, allowable emissions, and normal operating time.

F. Attach all other information supportive to the PSD review.

G. Discuss the social and economic impact of the selected technology versus other applicable technologies (i.e., jobs, payroll, production, taxes, energy, etc.). Include assessment of the environmental impact of the sources.

H. Attach scientific, engineering, and technical material, reports, publications, journals, and other competent relevant information describing the theory and application of the requested best available control technology.

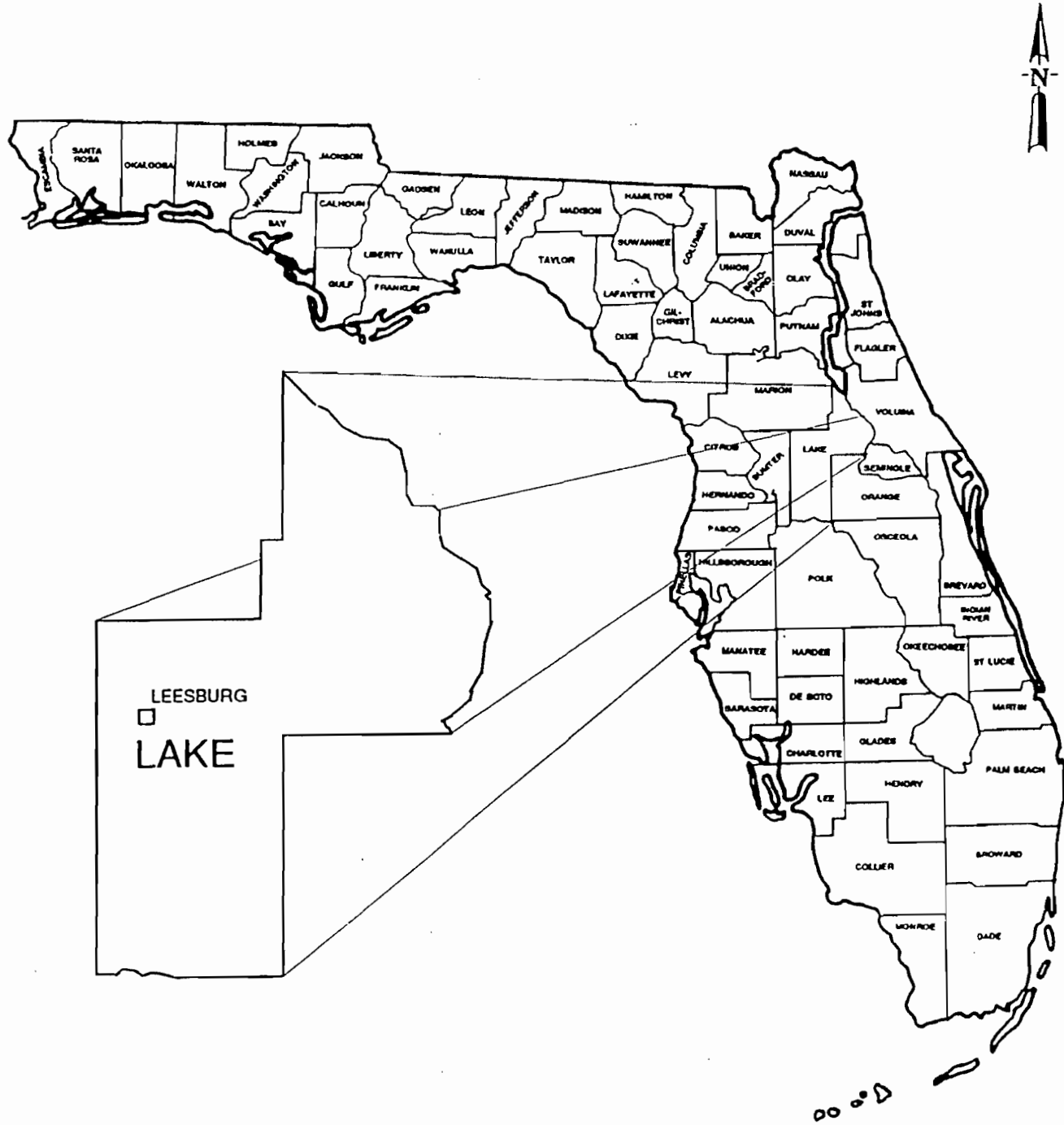


FIGURE 1.1. Lake County Locator Map - Florida

SOURCE: After Menke, Et Al., 1961.

Jones  
Edmunds &  
Associates, Inc. **JEA**

# LAKE GRIFFIN

ELEVATION 59

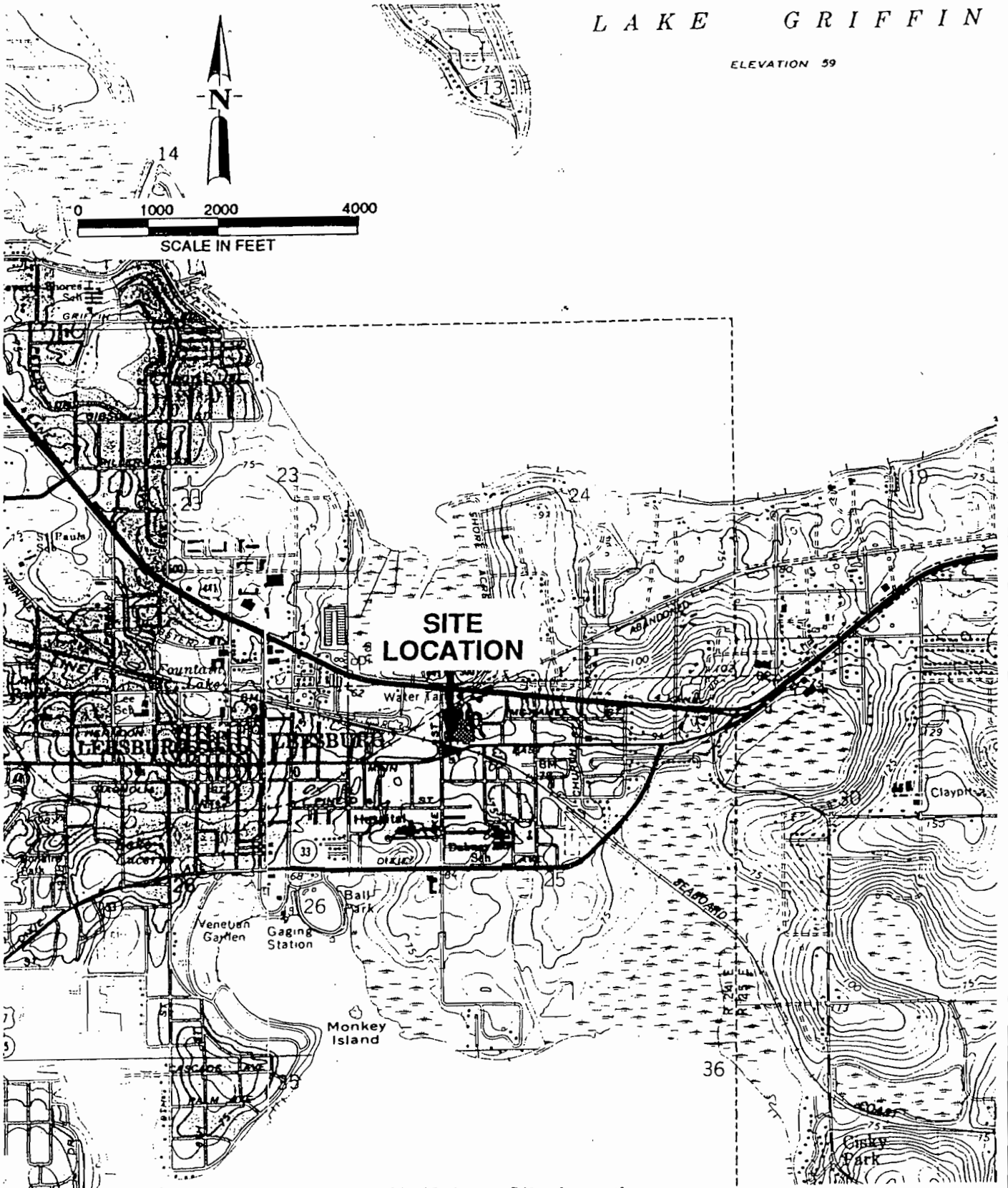
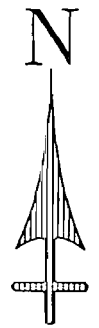
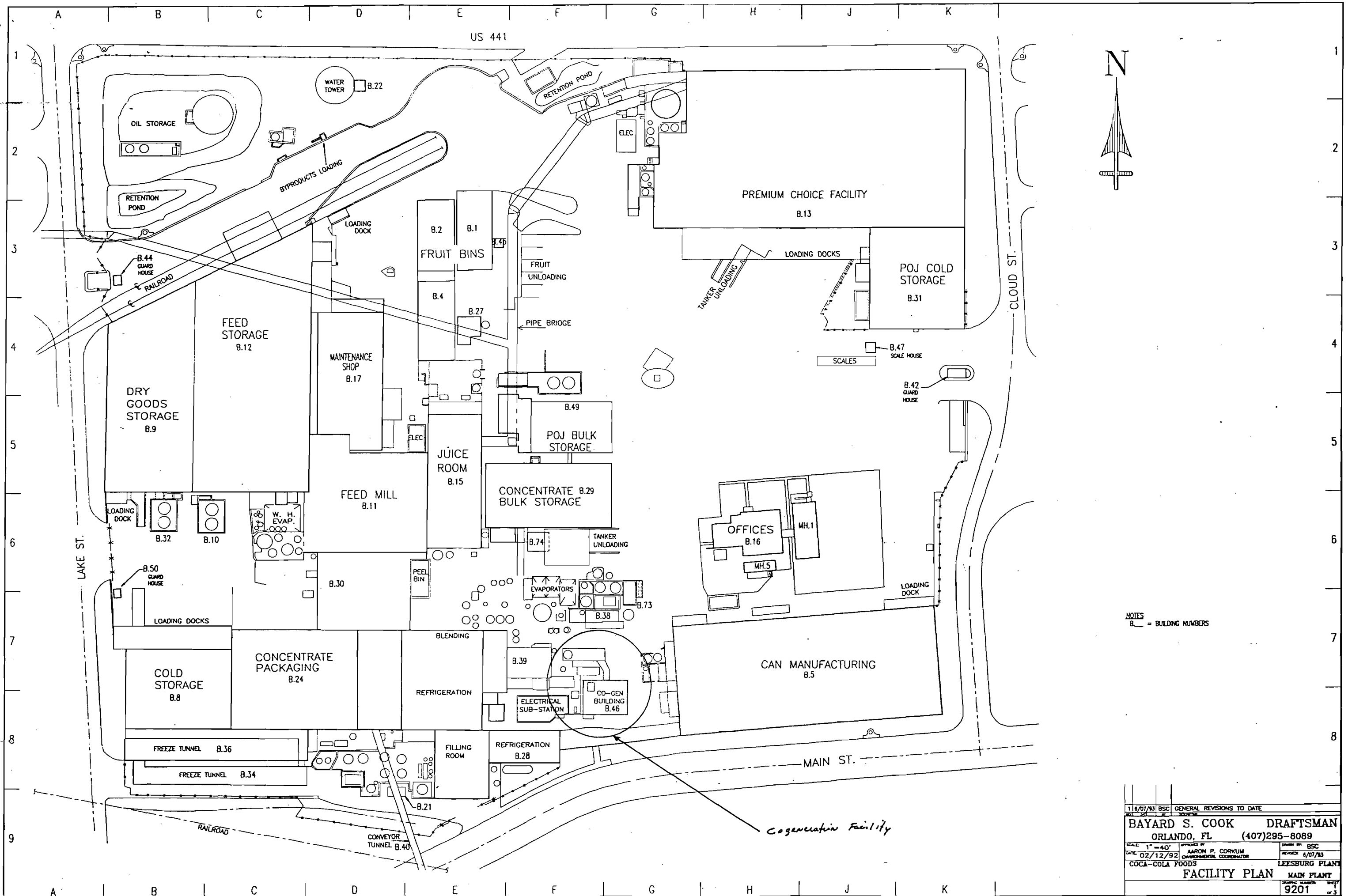


FIGURE 1.2. Site Location

SOURCE: USGS Quadrangle Leesburg East 1965,  
and Leesburg West 1966.

03750-447-01-08 #144



NOTES  
 B. = BUILDING NUMBERS

*Cogeneration Facility*

11/6/07/83	BSC	GENERAL REVISIONS TO DATE
BAYARD S. COOK		DRAFTSMAN
ORLANDO, FL		(407)295-8089
SCALE: 1" = 40'	APPROVED BY:	DATE: 02/12/92
AARON P. CORKUM	ENVIRONMENTAL COORDINATOR	REVISION: 6/07/83
COCA-COLA FOODS		LEESBURG PLANT
FACILITY PLAN		MAIN PLANT
DRAWING NUMBER: 9201		SHEET 1 OF 3

8

7

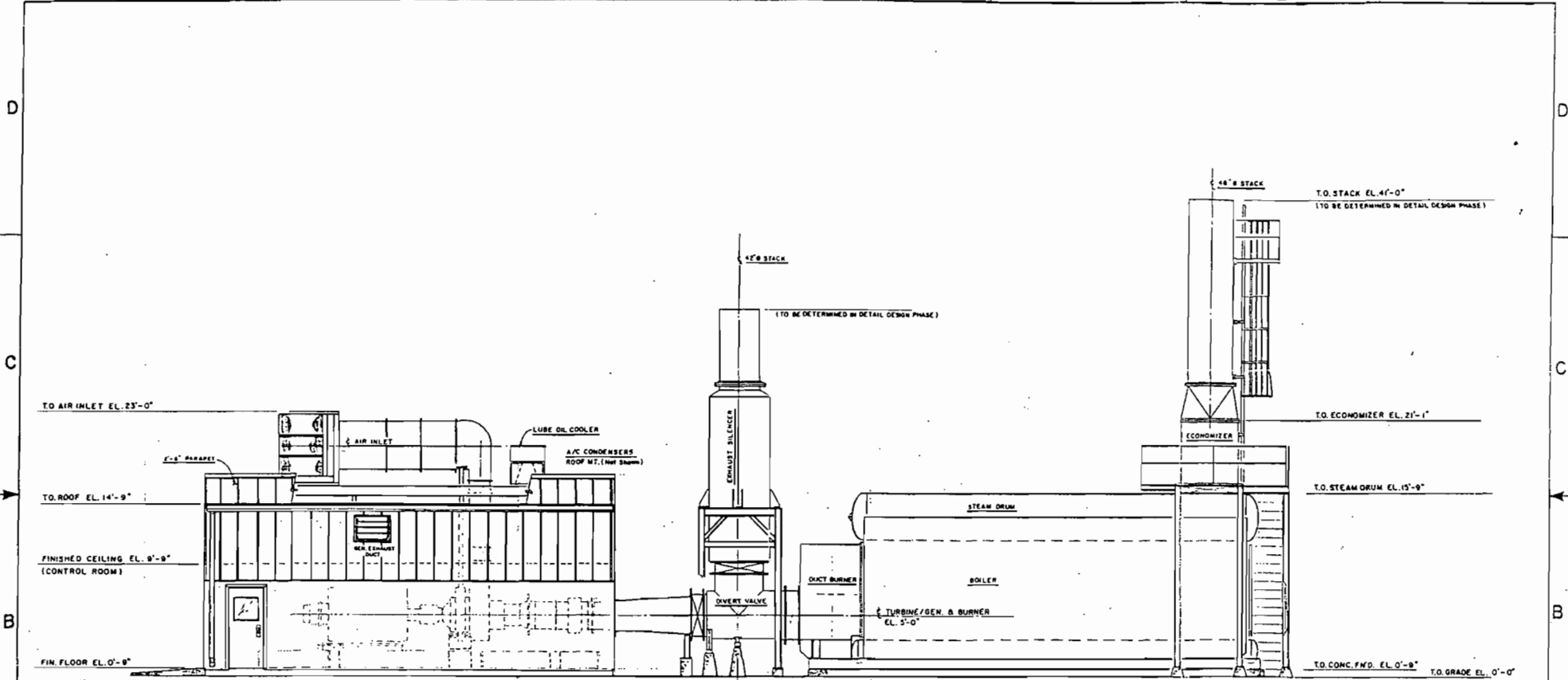
6

5

4

3

2



EAST ELEVATION

DRAWN	DESIGN	ZONE/LTR	DESCRIPTION	DATE APPROD	DRAWN	DESIGN	ZONE/LTR	DESCRIPTION	DATE APPROD
ENGINEERING			REVISIONS		ENGINEERING		REVISIONS		

APPROVED		DATE		DRAWING TITLE <b>EAST ELEVATION</b> <b>COCA COLA FOODS</b> <b>COGENERATION FACILITY</b> SOLAR TURBINES INCORPORATED
PROJECT	F. BRANES	DATE		
DESIGN	L. BRANES	DATE		
CHECK		DATE		
DRAFT		DATE		
STROBE		DATE		
SOLAR PROJECT ITEM NO. FL-81-001		CUSTOMER IDENT NO.		SOLAR TURBINES INCORPORATED DRAWING NO. 1400-M-002 SCALE 1/4" = 1' REV



29 '93 MON 11:18 ID:

TEL NO:813 653 9082

#816 P03

**Best Available Copy****WAIVER OF 90 DAY TIME LIMIT  
UNDER SECTIONS 120.60(2) and 403.0876, FLORIDA STATUTES**License (Permit, Certification) Application No. A035-153889Applicant's Name: Coca-Cola Foods

With regard to the above referenced application, the applicant hereby with full knowledge and understanding of applicant's rights under Sections 120.60(2) and 403.0876, Florida Statutes, waives the right to have the application approved or denied by the State of Florida Department of Environmental Regulation within the 90 day time period prescribed by law. Said waiver is made freely and voluntarily by the applicant, with full knowledge, and without any pressure or coercion by anyone employed by the State of Florida Department of Environmental Regulation.

This waiver shall expire on the 4th day of March 1994.

The undersigned is authorized to make this waiver on behalf of the applicant.

William P Jones  
SignatureWilliam P. Jones  
Name (Please Type or Print)

P 617 884 131



### Certified Mail Receipt

No Insurance Coverage Provided  
Do not use for International Mail  
(See Reverse)

Sent to <i>Lynne Stevenson</i>	
Street No. <i>Stevenson &amp; Assoc</i>	
P.O., State & ZIP Code <i>Tampa, FL 33619</i>	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Address of Delivery	
TOTAL Postage & Fees	\$
Postmark or Date <i>AC 35-195880</i>	<i>12-17-91</i>

PS Form 3800, June 1990

#### SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece next to the article number.

I also wish to receive the following services (for an extra fee):

- Addressee's Address
- Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:  
*Lynne Stevenson, Pres.  
 Stevenson & Assoc.  
 333 Faulkenburg N.B-214  
 Tampa, FL 33619*

4a. Article Number  
*P617 884 131*

4b. Service Type  
 Registered     Insured  
 Certified     COD  
 Express Mail     Return Receipt for Merchandise

7. Date of Delivery  
*12/19/91*

5. Signature (Addressee)  
*L. Stevenson*

6. Signature (Agent)

8. Addressee's Address (Only if requested and fee is paid)



# Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Carol M. Browner, Secretary

December 11, 1991

Lynne Stevenson, President  
Stevenson and Associates  
333 Faulkenburg N. B-214  
Tampa, Florida 33619

Dear Ms. Stevenson:

This is in reply to your November 22 letter requesting removal of the annual VE compliance test requirement for Coca-Cola Foods' natural gas boiler (AC 35-195880). It appears that you are referring to F.A.C. Rule 17-2.700(2)(a)5 which states that no annual compliance test is required for particulate matter emissions if a source does not burn liquid and/or solid fuel for more than 400 hours/yr. This rule provision does not apply to the subject permit since there is no Method 5 particulate matter test requirement. However, F.A.C. Rule 17-2.700(2)(a)4 requires annual compliance testing when a permit contains a visible emissions standard.

It is agreed that natural gas-fired boilers, when properly operated, do not generate detectable visible emissions. Yet, it is possible for such boilers to emit visible emissions under conditions of extremely low excess air firing. If you have further questions, please contact us.

Sincerely,

C. H. Fancy, P.E.  
Chief  
Bureau of Air Regulation

CHF/JR/plm

c: C. Collins, CD  
K. Given, P.E.  
A. Corkum, CCFI

# STEVENSON AND ASSOCIATES

RECEIVED

NOV 25 1991

Division of Air  
Resources Management

November 22, 1991

Mr. Barry Andrews  
Department of Environmental  
Regulation  
2600 Blair Stone Road  
Tallahassee, Florida 32399

RE: Coca Cola Foods, Inc.  
A035-174575

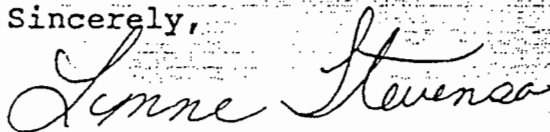
Dear Barry:

As authorized consultant to the above referenced facility I am hereby submitting a request for permit amendment of AC35-195880, of Specific Condition No. 4. (See Attachment I)

I originally requested the permit be amended through Jim Pennington's office, since it has to do with compliance testing (See Attachment II). I received a letter from Jim on October 24, 1991 (Attachment III) requesting the alternative test procedure process. I spoke with Jim on November 20, 1991 and explained to him this is a natural gas boiler with no capability of auxiliary fuel (i.e., fuel oil, coal, etc). Under this provision, 17-2.700(2) states that if "no liquid and/or solid fuel is burned for more than 400 hours" testing is not required. Jim informed me under these conditions the route to pursue was to request a permit amendment relieving them of the annual test requirement. An initial compliance test (Method 9, Visible Emission) was conducted by myself on September 4, 1991 and submitted with the Certificate of Completion. (See Attachment IV).

I appreciate your help and consideration in this matter. If you have any questions or need further information, please feel free to call.

Sincerely,



Lynne Stevenson  
President

cc: Aaron Corkum, Coca Cola Foods, Inc.

Jim Pennington, DER

Attachments: as stated

*c. J. Reynolds*  
*J. Turner, L. West*

ENVIRONMENTAL CONSULTING, ENGINEERING AND GEOLOGY

333 FAULKENBURG N. B-214 TAMPA, FLORIDA 33619  
(813) 651-0878 FAX (813) 653-9082

# STEVENSON AND ASSOCIATES

RECEIVED

NOV 25 1991

Division of Air  
Resources Management

November 22, 1991

Mr. Barry Andrews  
Department of Environmental  
Regulation  
2600 Blair Stone Road  
Tallahassee, Florida 32399

**RE; Coca Cola Foods, Inc.**  
**A035-174575**

Dear Barry:

As authorized consultant to the above referenced facility I am hereby submitting a request for permit amendment of AC35-195880, of Specific Condition No. 4. (See Attachment I)

I originally requested the permit be amended through Jim Pennington's office, since it has to do with compliance testing (See Attachment II). I received a letter from Jim on October 24, 1991 (Attachment III) requesting the alternative test procedure process. I spoke with Jim on November 20, 1991 and explained to him this is a natural gas boiler with no capability of auxiliary fuel (i.e., fuel oil, coal, etc). Under this provision, 17-2.700(2) states that if "no liquid and/or solid fuel is burned for more than 400 hours" testing is not required. Jim informed me under these conditions the route to pursue was to request a permit amendment relieving them of the annual test requirement. An initial compliance test (Method 9, Visible Emission) was conducted by myself on September 4, 1991 and submitted with the Certificate of Completion. (See Attachment IV)

I appreciate your help and consideration in this matter. If you have any questions or need further information, please feel free to call.

Sincerely,



Lynne Stevenson  
President

cc: Aaron Corkum, Coca Cola Foods, Inc.  
Jim Pennington, DER

Attachments: as stated

*c. J. Reynolds*  
*J. Turner, & Dist*

ENVIRONMENTAL CONSULTING, ENGINEERING AND GEOLOGY

333 FAULKENBURG N. B-214 TAMPA, FLORIDA 33619  
(813) 651-0878 FAX (813) 653-9082

ATTACHMENT I

PERMITTEE:  
Coca Cola Foods

Permit Number: AC 35-195880  
Expiration Date: December 31, 1992

GENERAL CONDITIONS:

records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.

c. Records of monitoring information shall include:

- the date, exact place, and time of sampling or measurements;
- the person responsible for performing the sampling or measurements;
- the dates analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and
- the results of such analyses.

15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

SPECIFIC CONDITIONS:

1. The construction and operation of this source shall be in accordance with the capacities and specifications stated in the application.

2. The new No. 4 package boiler may operate continuously (8760 hrs/yr). The existing No. 4 boiler shall permanently cease operation prior to the startup of the new boiler.

3. Only natural gas shall be fired in the boiler. The boiler heat input shall not exceed 55 MMBtu/hr, reflecting a steam generation rate of approximately 50,000 lbs/hr.

4. Visible emissions (VE) shall not exceed 5% opacity. Initial and annual compliance tests shall be conducted using DER Method 9 for VE.

# STEVENSON AND ASSOCIATES

September 5, 1991

Mr. Jim Pennington  
Bureau of Air Quality Management  
Department of Environmental Regulation  
2600 Blair Stone Road  
Tallahassee, Florida 32301

**RE: Coca Cola Foods, Inc.- AC35-195880**

Dear Jim:

As authorized consultant to the above referenced facility, I hereby submit a request for exemption from Specific Condition No. 4 which requires an annual visible emission test to be conducted. The basis of this request is due to the fact that the boiler is run exclusively on natural gas with no fuel oil back-up capabilities.

Please advise us upon your decision in this matter. Thank you for your consideration.

Sincerely,

Lynne Stevenson  
President

cc: Aaron Corkum, Coca Cola Foods, Inc.



## *Florida Department of Environmental Regulation*

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Carol M. Browner, Secretary

October 24, 1991

Lynne Stevenson, President  
Stevenson and Associates  
333 Faulkenburg North  
A-115  
Tampa, Florida 33619

Re: Coca Cola Foods (Leesburg)  
No. 4 Gas-Fired Package Boiler  
Permit No. AC 35-195880  
Request for Exception and Approval  
of An Alternative Procedure

Dear Ms. Stevenson:

We have received the above referenced request for approval of an alternative sampling procedure. In order to evaluate your request the following information will be needed:

- o A letter from the owner of the proposed source authorizing you to request an alternate sampling procedure.
- o The proposed alternative procedure (i.e., EPA Method 5) and requirement (i.e., mass particulate emission limitation) that will be used to demonstrate compliance with the applicable specific condition of the above referenced permit.
- o The results of the initial compliance test of the proposed source using the sampling procedure required by the proposed permit (EPA Method 9) and the results of any proposed alternative means of demonstrating compliance.
- o A complete copy of the report for the above referenced emission test report which includes all of the information required pursuant to Rule 17-2.700(7), F.A.C. [Test Reports].



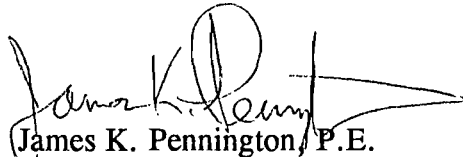
Lynne Stevenson  
October 24, 1991  
Page Two

The Department expects to act on the request within about 90 days after completion of construction, and receipt of the requested information.

Please include the information required by Rule 17-2.700(3)(b), F.A.C. [Exceptions and Approval of Alternate Procedures and Requirements], in the sequential order outlined by the rule in future requests for approval of alternate sampling procedures. Supplemental documentation which includes a letter of authorization from the owner or operator of the source should also be enclosed.

Please call Mike Harley at (904) 488-1344 if you have any questions regarding this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "James K. Pennington", with a large, stylized flourish extending to the right.

James K. Pennington, P.E.  
Administrator  
Compliance and Enforcement  
Section  
Bureau of Air Regulation

JKP\mdh

cc: C. Collins, FDER Central District  
A. Corkum, Coca Cola Foods



STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION  
AIR POLLUTION SOURCES  
CERTIFICATE OF COMPLETION OF CONSTRUCTION\*

PERMIT NO. AC35-195880 DATE: SEPTEMBER 10, 1991

Company Name: Coca Cola Foods County: Lake

Source Identification(s): #4 Boiler

Actual costs of serving pollution control purpose: \$ N/A

Operating Rates: 55 MMBTU/Hr Design Capacity: 55 MMBTU/Hr

Expected Normal 55 MMBTU/Hr During Compliance Test 55 MMBTU/Hr

Date of Compliance Test: SEPTEMBER 4, 1991 (Attach detailed test report)

Test Results:	Pollutant	Actual Discharge	Allowed Discharge
	<u>Particulate(Opacity)</u>	<u>0%</u>	<u>5%</u>
	<u></u>	<u></u>	<u></u>
	<u></u>	<u></u>	<u></u>

Date plant placed in operation: SEPTEMBER 2, 1991

This is to certify that, with the exception of deviations noted\*\*, the construction of the project has been completed in accordance with the application to construct and Construction Permit No. AC35-195880 dated JULY 30, 1991.

A. Applicant:

Mr. John Cox, Jr. Plant Manager  
Name of Person Signing (Type) Signature of Owner or Authorized Representative and Title

Date: \_\_\_\_\_ Telephone: (904) 728-7800

B. Professional Engineer:

Kenneth E. Given  
Name of Person Signing (Type) Signature of Professional Engineer

(FOR)  
STEVENSON & ASSOCIATES  
Company Name Florida Registration No. 23203

333 Falkenburg Rd. N, Suite B-214  
Mailing Address Date: \_\_\_\_\_

Tampa, Florida 33619  
Mailing Address (Seal)

(813) 651-0878  
Telephone Number

\*This form, satisfactorily completed, submitted in conjunction with an existing application to construct permit and payment of application processing fee will be accepted in lieu of an application to operate.

\*\*As built, if not built as indicated include process flow sketch, plot plan sketch, and updates of applicable pages of application form.

# STEVENSON AND ASSOCIATES

(813)-651-0878

Source/Process Information					Opacity Readings														
FACILITY NAME <i>Coca Cola Foods / Lushun</i>					OBSERVATION <i>7/14/91</i>					START TIME <i>10:15</i>					STOP TIME <i>11:15</i>				
SOURCE NAME <i>H Y Baker</i>			PERMIT NO. <i>AC35-195880</i>		SEC	0	15	30	45	SEC	0	15	30	45					
LOCATION/ADDRESS <i>11 Cloud St., Lushun, FL</i>					MIN					MIN									
CONTACT <i>Warren Cochran</i>			PHONE NO. <i>904/728-7800</i>		1	0	0	0	0	31	0	0	0	0					
PROCESS/PRODUCTION RATE <i>Baker</i>					2	0	0	0	0	32	0	0	0	0					
CONTROL EQUIPMENT <i>NONE</i>			OPERATING MODE <i>Continuous/Hot</i>		3	0	0	0	0	33	0	0	0	0					
FUEL TYPE/RATE <i>NAT GAS</i>		MATERIAL TYPE/RATE <i>NAT GAS/55</i>		PERMITTED RATE <i>55MMBtu</i>		4	0	0	0	34	0	0	0	0					
DESCRIBE EMISSION POINT <i>Stack Exit</i>					5	0	0	0	0	35	0	0	0	0					
HEIGHT ABOVE GROUND LEVEL <i>30 FT</i>			HEIGHT RELATIVE TO OBSERVER <i>30 FT</i>		6	0	0	0	0	36	0	0	0	0					
<b>Emissions Description</b>																			
DESCRIBE EMISSIONS START <i>NONE</i> END <i>NONE</i>					7	0	0	0	0	37	0	0	0	0					
PLUME COLOR <i>NONE</i>					8	0	0	0	0	38	0	0	0	0					
PLUME TYPE <i>NONE</i>					9	0	0	0	0	39	0	0	0	0					
WATER DROPLETS PRESENT YES <input type="checkbox"/> NO <input type="checkbox"/>					10	0	0	0	0	40	0	0	0	0					
IF YES, IS PLUME ATTACHED <input type="checkbox"/> DETACHED <input type="checkbox"/>					11	0	0	0	0	41	0	0	0	0					
<b>Meteorological Information</b>																			
BACKGROUND START <i>Shy</i> END <i>Shy</i>					12	0	0	0	0	42	0	0	0	0					
BACKGROUND COLOR START <i>Blue</i> END <i>Blue</i>					13	0	0	0	0	43	0	0	0	0					
SKY CONDITIONS % CLOUD COVER START <i>15</i> END <i>15</i>					14	0	0	0	0	44	0	0	0	0					
AMBIENT TEMP START <i>80's</i> END <i>80's</i>					15	0	0	0	0	45	0	0	0	0					
WIND SPEED START <i>5-8</i> END <i>5-8</i>					16	0	0	0	0	46	0	0	0	0					
WIND DIRECTION START <i>Variable</i> END <i>Same</i>					17	0	0	0	0	47	0	0	0	0					
<b>Observation Data, Site Diagram</b>																			
<div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"> <p>Stack with Plume </p> <p>Sun </p> <p>Wind </p> </div> <div style="width: 45%;"> <p>Draw North Arrow </p> </div> </div>					18	0	0	0	0	48	0	0	0	0	0	0			
					19	0	0	0	0	49	0	0	0	0					
					20	0	0	0	0	50	0	0	0						
					21	0	0	0	0	51	0	0	0						
					22	0	0	0	0	52	0	0	0						
					23	0	0	0	0	53	0	0	0						
					24	0	0	0	0	54	0	0	0						
					25	0	0	0	0	55	0	0	0						
					26	0	0	0	0	56	0	0	0						
					27	0	0	0	0	57	0	0	0						
					28	0	0	0	0	58	0	0	0						
					29	0	0	0	0	59	0	0	0						
					30	0	0	0	0	60	0	0	0						
<b>Compliance Information</b>																			
RANGE OF OPACITY READINGS MIN <i>0</i> MAX <i>0</i>					<b>Certification Data, Signatures</b>														
AVERAGE OF HIGHEST 24 CONSECUTIVE READINGS <i>0%</i>					OBSERVERS NAME <i>Lynne Stevenson</i>					OBSERVERS SIGNATURE <i>Dorrie Stevenson</i>									
SHORT TERM AVERAGE DATA					COMMENTS <i>High Flow during test.</i>					CERTIFIED BY <i>ETA</i>									
AVERAGING PERIOD _____ MINUTES ACTUAL AVERAGE _____ %					DATE <i>8/91</i>					I HAVE RECEIVED A COPY OF THESE OBSERVATIONS SIGNATURE _____ DATE _____									
<b>Process Rate Data</b>					APIS NUMBER _____														
I CERTIFY THE ABOVE PROCESS RATE DATA IS TRUE TO THE BEST OF MY KNOWLEDGE.																			

# STEVENSON AND ASSOCIATES

July 12, 1991

RECEIVED  
JUL 24 1991  
Division of Air  
Resources Management

Mr. Barry Andrews  
Bureau of Air Quality  
Department of Environmental  
Regulation  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32301

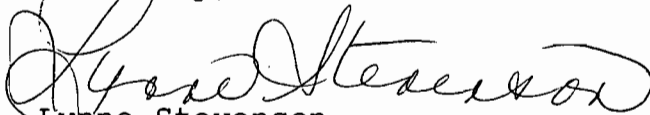
RE: Coca Cola Foods, Inc.  
AC35-195880

Dear Mr. Andrews:

Pursuant to our telephone conversation of July 11, 1991, enclosed is Proof of Publication for the above referenced Intent to Issue. Once again, it will be greatly appreciated if this permit can be issued as soon as possible since operations at the Coca Cola facility are dependent upon installation of this system (a modification to an existing permit).

Thank you once again for your cooperation in this matter. If you have any questions, please do not hesitate to contact me.

Sincerely,



Lynne Stevenson  
President

Enclosures: as stated

cc: Aaron Corkum, Coca Cola Foods, Inc.

ENVIRONMENTAL CONSULTING, ENGINEERING AND GEOLOGY

333 FAULKENBURG N. A-115 TAMPA, FLORIDA 33619  
(813) 651-0878 FAX (813) 653-4421

# Affidavit of Publication

**Daily Commercial** Leesburg, Lake County, Florida

Case No. \_\_\_\_\_

STATE OF FLORIDA  
COUNTY OF LAKE

Before the undersigned authority personally appeared Paul Clarin, who on oath says that he is Controller of the Daily Commercial, a daily newspaper published at Leesburg in Lake County, Florida, that the attached copy of advertisement, being \_\_\_\_\_

Legal ad # 79BN00400  
in the matter of notice of intent to  
issue permit.  
in the \_\_\_\_\_

Court was published in said newspaper in the issues of \_\_\_\_\_

July 11, 1991

Affiant further says that the said Daily Commercial is a newspaper published in said Leesburg, in said Lake County, Florida, and that the said newspaper has heretofore been continuously published in said Lake County, Florida and has been entered as second class matter at the post office in Leesburg in said Lake County, Florida, for a period of one year preceding the first publication of the attached copy of advertisement; and affiant further says that he has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in said newspaper.

Signed Paul A. Clarin  
Controller

Sworn to and subscribed before me this 11th

day of July A.D. 19 91

(Seal) W. K. Newberry  
Notary Public  
Notary Public, State of Florida at Large  
My Commission Expires Aug. 28, 1994

My Commission Expires \_\_\_\_\_  
PUBLIC  
STATE OF FLORIDA

Attach Notice Here

**STATE OF FLORIDA  
DEPARTMENT OF  
ENVIRONMENTAL  
REGULATION  
NOTICE OF INTENT  
TO ISSUE PERMIT**

The Department of Environmental Regulation gives notice of its intent to issue a permit to Coca Cola Foods to install a 55 MMBtu/hr package boiler at their facility located at 11 Cloud Street, Leesburg, Lake County, Florida 34748. A determination of Best Available Control Technology (BACT) was required. The Department is issuing this Intent to Issue for the reasons stated in the Technical Evaluation and Preliminary Determination.

A person whose substantial interest are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within 14 days of publication of this notice. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this

time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

The petition shall contain the following information; (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed; (b) A statement of how and when each petitioner received notice of the Department's action or proposed action; (c) A statement of how each petitioner's substantial interest are affected by the Department's action or proposed action; (d) A statement of the material facts disputed by Petitioner, if any; (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action; (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and (g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the

administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this Notice. Persons whose substantial interest will be affected by any decision of the Department with regard to the application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of publication of this notice in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

The application is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at: Department of Environmental Regulation, Bureau of Air Regulations 26009 Blair Stone Road-Tallahassee, FL 32399-2400

Department of Environmental Regulation  
Central District  
3319 Maguire Boulevard, Suite 232  
Orlando, Florida 32803-3767  
No. 79BN00400  
July 11, 1991

P 832 539 800



### Certified Mail Receipt

No Insurance Coverage Provided  
Do not use for International Mail  
(See Reverse)

Sent to <i>John Cox</i>	
Street & No. <i>Coca Cola F</i>	
P.O., State & ZIP Code <i>Lalburg, FL</i>	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Address of Delivery	
TOTAL Postage & Fees	\$
Postmark or Date	<i>7-1-91</i>
<i>AC 35-195880</i>	

PS Form 3800, June 1990

**SENDER:** Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.  
Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1.  Show to whom delivered, date, and addressee's address. (Extra charge)      2.  Restricted Delivery (Extra charge)

3. Article Addressed to: <i>Mr. John Cox, Jr. Plant Mgr Coca Cola Foods 11 Cloud St. Lalburg, FL 34748</i>	4. Article Number <i>P 832 539 800</i>
5. Signature - Addressee <i>X</i>	Type of Service: <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise
6. Signature - Agent <i>[Signature]</i>	Always obtain signature of addressee or agent and DATE DELIVERED.
7. Date of Delivery <i>9 7-3</i>	8. Addressee's Address (ONLY if requested and fee paid)

PLEASE KEEP THIS SLIP WITH PERMIT UNTIL MAILOUT

Coca Cola Foods 35-195880

Company

Permit Number

Date ~~6-12-91~~ DAY ~~55~~

~~6-19-91~~ ~~62~~

~~6-27-91~~ ~~70~~

7-1-91 74

PRG-424

TEPD-425

PER-426



# Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Carol M. Browner, Secretary

July 1, 1991

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Mr. John Cox, Jr., Plant Manager  
Coca Cola Foods  
11 Cloud Street  
Leesburg, Florida 34748

Dear Mr. Cox:

Attached is one copy of the Technical Evaluation and Preliminary Determination and proposed permit to install a 55 MMBtu/hr package boiler at your facility in Leesburg, Lake County, Florida.

Please submit any written comments you wish to have considered concerning the Department's proposed action to Mr. Barry Andrews of the Bureau of Air Regulation.

Sincerely,

for

C. H. Fancy, P.E.  
Chief  
Bureau of Air Regulation

CHF/JR/plm

Attachments

c: C. Collins, CD  
K. Given, P.E.  
A. Corkum, CCF



STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

CERTIFIED MAIL

In the Matter of an  
Application for Permit by:

DER File No. AC 35-195880  
Lake County

Coca Cola Foods  
P. O. Box 490720  
Leesburg, Florida 34749

---

INTENT TO ISSUE

The Department of Environmental Regulation gives notice of its intent to issue a permit (copy attached) for the proposed project as detailed in the application specified above, for the reasons stated in the attached Technical Evaluation and Preliminary Determination.

The applicant, Coca Cola Foods, applied on April 19, 1991, to the Department of Environmental Regulation for a permit to install a 55 MMBtu/hr package boiler at their facility in Leesburg, Lake County, Florida.

The Department has permitting jurisdiction under the provisions of Chapter 403, Florida Statutes and Florida Administrative Code Chapters 17-2 and 17-4. The project is not exempt from permitting procedures. The Department has determined that a construction permit is required for the proposed work.

Pursuant to Section 403.815, Florida Statutes and DER Rule 17-103.150, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Notice of Intent to Issue Permit. The notice shall be published one time only within 30 days in the legal ad section of a newspaper of general circulation in the area affected. For the purpose of this rule, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. Where there is more than one newspaper of general circulation in the county, the newspaper used must be one with significant circulation in the area that may be affected by the permit. If you are uncertain that a newspaper meets these requirements, please contact the Department at the address or telephone number listed below. The applicant shall provide proof of publication to the Department's Bureau of Air Regulation, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within seven days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit.

The Department will issue the permit with the attached conditions unless a petition for an administrative proceeding (hearing) is filed pursuant to the provisions of Section 120.57, F.S.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Petitions filed by the permit applicant and the parties listed below must be filed within 14 days of receipt of this intent. Petitions filed by other persons must be filed within 14 days of publication of the public notice or within 14 days of their receipt of this intent, whichever first occurs. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

The Petition shall contain the following information;

(a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;

(b) A statement of how and when each petitioner received notice of the Department's action or proposed action;

(c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;

(d) A statement of the material facts disputed by Petitioner, if any;

(e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;

(f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and

(g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this intent. Persons whose substantial interests will be affected by any decision of the Department with regard to the application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of receipt of this intent in the Office of General Counsel at the above address of the Department.

Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION



C. H. Fancy, P.E., Chief  
Bureau of Air Regulation  
2600 Blair Stone Road  
Tallahassee, Florida 32399  
904-488-1344

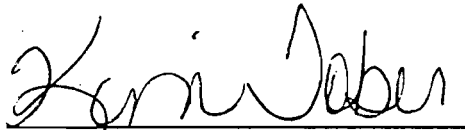
CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this INTENT TO ISSUE and all copies were mailed by certified mail before the close of business on 7-1-91 to the listed persons.

Clerk Stamp

**FILING AND ACKNOWLEDGMENT**

FILED, on this date, pursuant to §120.52(11), Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

 7-1-91  
Clerk Date

Copies furnished to:

C. Collins, CD  
K. Given, P.E.  
A. Corkum, CCF

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION  
NOTICE OF INTENT TO ISSUE PERMIT

The Department of Environmental Regulation gives notice of its intent to issue a permit to Coca Cola Foods to install a 55 MMBtu/hr package boiler at their facility located at 11 Cloud Street, Leesburg, Lake County, Florida 34748. A determination of Best Available Control Technology (BACT) was required. The Department is issuing this Intent to Issue for the reasons stated in the Technical Evaluation and Preliminary Determination.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within 14 days of publication of this notice. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

The Petition shall contain the following information; (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed; (b) A statement of how and when each petitioner received notice of the Department's action or proposed action; (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action; (d) A statement of the material facts disputed by Petitioner, if any; (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action; (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and (g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this Notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of publication of this notice in the Office of General Counsel at the above address of the

Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

The application is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Department of Environmental Regulation  
Bureau of Air Regulation  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Department of Environmental Regulation  
Central District  
3319 Maguire Blvd., Suite 232  
Orlando, Florida 32803-3767

Any person may send written comments on the proposed action to Mr. Barry Andrews at the Department's Tallahassee address. All comments mailed within 14 days of the publication of this notice will be considered in the Department's final determination.

Technical Evaluation  
and  
Preliminary Determination

Coca Cola Foods  
Lake County  
Leesburg, Florida

Installation of No. 4 Boiler

Permit Number: AC 35-195880

Florida Department of Environmental Regulation  
Division of Air Resources Management  
Bureau of Air Regulation

July 1, 1991

I. Application

A. Coca Cola Foods  
Post Office Box 490720  
Leesburg, Florida 34749-0720

B. Request

The Department received a complete application on April 19, 1991, for a permit to install a new 55 MMBtu/hr gas-fired packaged boiler to replace an existing 35 MMBtu/hr boiler (No. 4) at the applicant's facility in Leesburg, Florida.

C. Location/Classification

The applicant's food product manufacturing facility (SIC Code 2099) is located at 11 Cloud Street in Leesburg. Latitude and longitude are 28°49'54"N and 81°49'40"W, respectively. The UTM coordinates of the site are: Zone 17, 415.5 km E and 3,187.3 km N.

II. Project Description/Emissions

It is proposed to increase steam production by approximately 18,000 lbs/hr through installation of a new 55 MMBtu/hr gas-fired boiler (No. 4) which will replace the existing No. 4 boiler rated at 35 MMBtu/hr. Total steam production will be increased from about 32,000 lbs/hr to approximately 50,000 lbs/hr. Emission estimates are tabulated below:

NO. 4 BOILER

	Current Emissions @ 32,000 lbs/hr	Proposed Emissions @ 50,000 lbs/hr	Increase 18,000 lbs/hr
NOx	4.69 lbs/hr (20.54 TPY)	7.33 lbs/hr (32.12 TPY)	2.64 lbs/hr (11.58 TPY)
SO <sub>2</sub>	.02 lb/hr (.09 TPY)	.03 lb/hr (.14 lb/hr)	.01 lb/hr (.05 lb/hr)
PM	.07 lb/hr (.31 TPY)	.10 lb/hr (.44 TPY)	.03 lb/hr (.13 TPY)

(Figures are approximate)

III. Rule Applicability

The proposed project is subject to preconstruction review under the provisions of Florida Administrative Code (F.A.C.) Chapters 17-2 and 17-4. The source is located in an area designated attainment for applicable regulated air pollutants. Since the source is minor with respect to the provisions of F.A.C. Rule 17-2.500 and since there will be an offset of emissions due to the contemporaneous shutdown of the existing No. 4 boiler, the

project is not subject to the Prevention of Significant Deterioration (PSD) regulations set forth in F.A.C. Rule 17-2.500. F.A.C. Rule 17-2.520, Sources Not Subject to Prevention of Significant Deterioration or Nonattainment Requirements, will apply to this project as will F.A.C. Rule 17-2.600(6), Fossil Fuel Steam Generators with less than 250 million Btu per hour heat input, new and existing sources. The federal new source performance standards, 40 CFR 60, Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units, would apply if a non-gaseous fuel (coal, oil, or wood) had been used. However, only natural gas will be fired in the boiler and emission limits will be established by the BACT determination.

#### IV. Conclusion

Based on the information provided by Coca Cola Foods, the Department has reasonable assurance that the proposed project, as proposed herein, will not cause or contribute to a violation of an ambient air quality standard, PSD increment, or any other technical provisions of Chapter 17-2 of the Florida Administrative Code.







# Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Carol M. Browner, Secretary

**PERMITTEE:**  
Coca Cola Foods  
11 Cloud Street  
Leesburg, Florida 34748

Permit Number: AC 35-195880  
Expiration Date: Dec. 31, 1992  
County: Lake  
Latitude/Longitude: 28°49'54"N  
81°49'40"W  
Project: No. 4 Gas Fired Package  
Boiler

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 17-2 and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawings, plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

For the installation of a 55 MMBtu/hr package boiler at Coca Cola Food's facility in Leesburg, Lake County, Florida.

The source shall be constructed in accordance with the permit application, plans, documents, amendments and drawings, except as otherwise noted in the General and Specific Conditions.

Attachments are listed below:

1. Application package received April 19, 1991.

PERMITTEE:  
Coca Cola Foods

Permit Number: AC 35-195880  
Expiration Date: December 31, 1992

**GENERAL CONDITIONS:**

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.

2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.

3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.

4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.

5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

PERMITTEE:  
Coca Cola Foods

Permit Number: AC 35-195880  
Expiration Date: December 31, 1992

GENERAL CONDITIONS:

6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:

- a. Have access to and copy any records that must be kept under the conditions of the permit;
- b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:

- a. a description of and cause of non-compliance; and
- b. the period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

PERMITTEE:  
Coca Cola Foods

Permit Number: AC 35-195880  
Expiration Date: December 31, 1992

**GENERAL CONDITIONS:**

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 17-4.120 and 17-30.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

12. This permit or a copy thereof shall be kept at the work site of the permitted activity.

13. This permit also constitutes a Determination of Best Available Control Technology (BACT).

14. The permittee shall comply with the following:

a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.

b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance

PERMITTEE:  
Coca Cola Foods

Permit Number: AC 35-195880  
Expiration Date: December 31, 1992

**GENERAL CONDITIONS:**

records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.

c. Records of monitoring information shall include:

- the date, exact place, and time of sampling or measurements;
- the person responsible for performing the sampling or measurements;
- the dates analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and
- the results of such analyses.

15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

**SPECIFIC CONDITIONS:**

1. The construction and operation of this source shall be in accordance with the capacities and specifications stated in the application.

2. The new No. 4 package boiler may operate continuously (8760 hrs/yr). The existing No. 4 boiler shall permanently cease operation prior to the startup of the new boiler.

3. Only natural gas shall be fired in the boiler. The boiler heat input shall not exceed 55 MMBtu/hr, reflecting a steam generation rate of approximately 50,000 lbs/hr.

4. Visible emissions (VE) shall not exceed 5% opacity. Initial and annual compliance tests shall be conducted using DER Method 9 for VE.

PERMITTEE:  
Coca Cola Foods

Permit Number: AC 35-195880  
Expiration Date: December 31, 1992

**SPECIFIC CONDITIONS:**

5. The Department shall be notified in writing 15 days or more prior to each compliance test. The tests shall be conducted at permitted production capacity or no less than 90% thereof. Actual heat input rate during the test shall be reported along with the emission results. Test reports shall be submitted to the Department's Central District office within 45 days of compliance test completion.

8. The permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the Bureau of Air Regulation prior to 60 days before the expiration of the permit (F.A.C. Rule 17-4.090).

9. An application for an operation permit must be submitted to the Central District office at least 90 days prior to the expiration date of this construction permit. To properly apply for an operation permit, the applicant shall submit the appropriate application form, fee, certification that construction was completed noting any deviations from the conditions in the construction permit, and compliance test reports as required by this permit (F.A.C. Rules 17-4.055 and 17-4.220).

Issued this \_\_\_\_\_ day  
of \_\_\_\_\_, 1991

**STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION**

---

STEVE SMALLWOOD, P.E.  
Director  
Division of Air Resources  
Management

Best Available Control Technology (BACT) Determination  
Coca Cola Foods  
Lake County

The applicant plans to install a new 55 MMBtu/hr gas-fired boiler at their facility in Leesburg, Florida. The boiler will fire only natural gas. This BACT determination is required for the source as set forth in the Florida Administrative Code Rule 17-2.600(6) - Emission Limiting and Performance Standards.

BACT Determination Request by the Applicant:

The applicant was not aware of the requirement of BACT determinations for particulate and sulfur dioxide emissions. The Department elected to process the application and to disregard this deficiency in the application.

BACT Determination by DER:

The amount of particulate and sulfur dioxide emissions from the boiler will be limited by the firing of natural gas. Visible emissions shall not exceed 5% opacity.

Details of the Analysis May Be Obtained By Contacting:

Barry Andrews P.E., BACT Coordinator  
Department of Environmental Regulation  
Bureau of Air Regulation  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Recommended By:

\_\_\_\_\_  
C. H. Fancy, P.E., Chief  
Bureau of Air Regulation

\_\_\_\_\_  
Date

Approved By:

\_\_\_\_\_  
Steve Smallwood, P.E. Director  
Division of Air Resource Management

\_\_\_\_\_  
Date

**Coca-Cola Foods**  
A Division of The Coca-Cola Company

RECEIVED  
P.O. Box 490720  
Leesburg, FL 34749-0720  
Tel./904-728-7800

1991 APR 19 PM 4:14

RECEIVED

APR 19 1991

DER-BAQM

April 15, 1991

Claire Fancy  
Central Air Permitting  
Department of Environmental Regulation  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Dear Ms. Fancy:

Enclosed please find two (2) copies of the Application for Modification for the Boiler #4.

Also enclosed is a check for \$500.00 for the application fee.

If you have any questions, please give me a call at (904)728-7800.

Sincerely,

**Coca-Cola Foods**

*Aaron P. Corkum*

Aaron P. Corkum  
Environmental Coordinator

APC/ad

Enclosures

cc: *J. Reynolds*  
*C. Collins*

1071



**Coca-Cola Foods**  
A Division of The Coca-Cola Company

P.O. BOX 490720  
LEESBURG, FLORIDA 34749-0720

Fold at line over top of envelope to the right  
of the return address

**CERTIFIED**

P 778 791 750

**MAIL**



Claire Fancy  
Central Air Permitting  
Department of Environmental Regulation  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

TEXAS COMMERCE BANK  
CORPUS CHRISTI  
CORPUS CHRISTI, TEXAS

REGULAR ACCOUNT

PAY TO THE ORDER OF:

FLORIDA DEPT ENVIRONMENTAL  
TWIN TOWER OFFICE  
2600 BLAIR STONE RD  
TALLAHASSEE FL 32399

*Coca-Cola Foods*  
A Division of The Coca-Cola Company

P.O. BOX 2079 • HOUSTON, TEXAS 77252

DATE 04/11/91

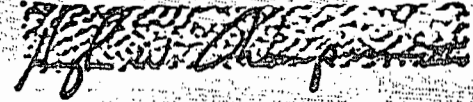
88-2149  
1149

No. 699166

AMOUNT

\$ \*\*\*\*\*500.00

COCA-COLA FOODS



Claire Fancy  
Central Air Permitting  
Department of Environmental Regulation  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Dear Ms. Fancy:

Enclosed please find two (2) copies of the Application for Modification for the Boiler #4.

Also enclosed is a check for \$500.00 for the application fee.

If you have any questions, please give me a call at (904)728-7800.

Sincerely,

*Coca-Cola Foods*



Aaron P. Corkum  
Environmental Coordinator

APC/ad

Enclosures

1021



2000 ST. JAMES PLACE - HOUSTON, TEXAS 77056  
 REPLY TO: P.O. BOX 2079, HOUSTON, TEXAS - 77252 - (713) 888-5000

# Purchase Order

**NO. C 24638**

THIS NUMBER MUST APPEAR ON ALL INVOICES/PACKAGES, SHIPPING PAPERS AND CORRESPONDENCE.

DATE April 4, 1991

PLEASE INCLUDE "ATTENTION OF" ON ALL SHIPPING LABELS AS SHOWN HERE BELOW.

TO Dept. of Environmental Regulation  
 Attn: Claire Fancy  
 Central Air Permitting  
 2600 Blaire Stone Road  
 Tallahassee, Florida 32399-02400

**COCA-COLA FOODS**  
 SHIP TO: ATTENTION: John Bohmann

11 Cloud Street  
 Leesburg, FL 34748

DATE REQUIRED 5/15/91	ROUTING N/A	FREIGHT CHARGES N/A	F.O.B. N/A	TERMS % NET 30
--------------------------	----------------	------------------------	---------------	-------------------

ITEM	QUANTITY	CODE	SPECIFICATIONS	PRICE
1	1		This P.O. covers the \$500.00 filing fee which is required while applying for a modification to the Leesburg's plant #4 boiler permit.	\$500.00
TAX EXEMPT NUMBER _____				

**RECEIVED**  
 APR 8 1991  
 DER - BAQM

**THE FOLLOWING INSTRUCTIONS ARE IMPORTANT.**

- Render an **ACKNOWLEDGEMENT** at once showing prices, terms, and date you will ship.
- **INVOICES: MAIL ORIGINAL and TWO COPIES to:**

ACCEPTANCE OF THIS ORDER SHALL CONSTITUTE ACCEPTANCE OF THE TERMS AND CONDITIONS STATED ON THE FACE AND REVERSE SIDE.

Fixed Asset Payable Department, P.O. Box 2079, Houston, Texas 77252  
 ATTENTION:



- (a) must be accompanied by B/L and/or other shipping papers.
- (b) must be certified to comply with the Fair Labor Standards Act of 1938, as amended.
- (c) must be rendered separately for each order.

*John Bohmann*



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

DER Form # \_\_\_\_\_
Form Title \_\_\_\_\_
Effective Date \_\_\_\_\_
DER Application No. \_\_\_\_\_ (Filed in by DER)

AC 35-195880

\$500 pd.
4-19-91
Receipt #151264

APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: BOILER [ ] New [X] Existing

APPLICATION TYPE: [ ] Construction [ ] Operation [X] Modification

COMPANY NAME: COCA COLA FOODS COUNTY: LAKE

Identify the specific emission point source(s) addressed in this application (i.e. Lime Kiln No. 4 with Venturi Scrubber; Peaking Unit No. 2, Gas Fired) BOILER #4

SOURCE LOCATION: Street 11 Cloud Street City Leesburg

UTM: East 17-415.5 North 3187.3

Latitude 28 ° 49 ' 54 "N Longitude 81 ° 49 ' 40 "W

APPLICANT NAME AND TITLE: John Cox, Jr., Plant Manager

APPLICANT ADDRESS: 11 Cloud Street, Leesburg, FL 34748

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

I am the undersigned owner or authorized representative\* of COCA COLA FOODS, INC.

I certify that the statements made in this application for a modification permit are true, correct and complete to the best of my knowledge and belief. Further, I agree to maintain and operate the pollution control source and pollution control facilities in such a manner as to comply with the provision of Chapter 403, Florida Statutes, and all the rules and regulations of the department and revisions thereof. I also understand that a permit, if granted by the department, will be non-transferable and I will promptly notify the department upon sale or legal transfer of the permitted establishment.

\*Attach letter of authorization

Signed: [Signature]
John Cox, Jr., Plant Manager
Name and Title (Please Type)

Date: 4/15/91 Telephone No. (904)728-7800

B. PROFESSIONAL ENGINEER REGISTERED IN FLORIDA (where required by Chapter 471, F.S.)

This is to certify that the engineering features of this pollution control project have been designed/examined by me and found to be in conformity with modern engineering principles applicable to the treatment and disposal of pollutants characterized in the permit application. There is reasonable assurance, in my professional judgment, that

1 See Florida Administrative Code Rule 17-2.100(57) and (104)

the pollution control facilities, when properly maintained and operated, will discharge an effluent that complies with all applicable statutes of the State of Florida and the rules and regulations of the department. It is also agreed that the undersigned will furnish, if authorized by the owner, the applicant a set of instructions for the proper maintenance and operation of the pollution control facilities and, if applicable, pollution sources.



Signed Kenneth E. Given  
**Kenneth E. Given, P.E. (for)**  
Name (Please Type)

**STEVENSON & ASSOCIATES**  
Company Name (Please Type)  
**333 Falkenburg Road, Unit A-115**  
**Tampa, Florida 33619**  
Mailing Address (Please Type)

Florida Registration No. 23203 Date: 3/20/91 Telephone No. (813)651-0878

**SECTION II: GENERAL PROJECT INFORMATION**

A. Describe the nature and extent of the project. Refer to pollution control equipment, and expected improvements in source performance as a result of installation. State whether the project will result in full compliance. Attach additional sheet if necessary.

To replace an existing permitted natural gas fired 35 MMBTU Boiler  
with a 55 MMBTU natural gas boiler

B. Schedule of project covered in this application (Construction Permit Application Only)  
Start of Construction upon issuance Completion of Construction 1 year from issuance

C. Costs of pollution control system(s): (Note: Show breakdown of estimated costs only for individual components/units of the project serving pollution control purposes. Information on actual costs shall be furnished with the application for operation permit.)  
N/A

D. Indicate any previous DER permits, orders and notices associated with the emission point, including permit issuance and expiration dates.  
A035-174575 09/30/90 - 04/25/95

E. Requested permitted equipment operating time: hrs/day 24 ; days/wk 7 ; wks/yr 52 ;  
if power plant, hrs/yr \_\_\_\_\_ ; if seasonal, describe: \_\_\_\_\_

F. If this is a new source or major modification, answer the following questions.  
(Yes or No)

1. Is this source in a non-attainment area for a particular pollutant? NO
  - a. If yes, has "offset" been applied? \_\_\_\_\_
  - b. If yes, has "Lowest Achievable Emission Rate" been applied? \_\_\_\_\_
  - c. If yes, list non-attainment pollutants. \_\_\_\_\_
2. Does best available control technology (BACT) apply to this source?  
If yes, see Section VI. NO
3. Does the State "Prevention of Significant Deterioration" (PSD)  
requirement apply to this source? If yes, see Sections VI and VII. NO
4. Do "Standards of Performance for New Stationary Sources" (NSPS)  
apply to this source? NO
5. Do "National Emission Standards for Hazardous Air Pollutants"  
(NESHAP) apply to this source? NO

- H. Do "Reasonably Available Control Technology" (RACT) requirements apply  
to this source? \_\_\_\_\_
- a. If yes, for what pollutants? \_\_\_\_\_
  - b. If yes, in addition to the information required in this form,  
any information requested in Rule 17-2.650 must be submitted.

Attach all supportive information related to any answer of "Yes". Attach any justifi-  
cation for any answer of "No" that might be considered questionable.

E. Requested permitted equipment operating time: hrs/day 24; days/wk 7; wks/yr 52;  
if power plant, hrs/yr \_\_\_\_\_; if seasonal, describe: \_\_\_\_\_

F. If this is a new source or major modification, answer the following questions.  
(Yes or No)

1. Is this source in a non-attainment area for a particular pollutant? No
  - a. If yes, has "offset" been applied? \_\_\_\_\_
  - b. If yes, has "Lowest Achievable Emission Rate" been applied? \_\_\_\_\_
  - c. If yes, list non-attainment pollutants. \_\_\_\_\_
2. Does best available control technology (BACT) apply to this source?  
If yes, see Section VI. No
3. Does the State "Prevention of Significant Deterioration" (PSD)  
requirement apply to this source? If yes, see Sections VI and VII. No
4. Do "Standards of Performance for New Stationary Sources" (NSPS)  
apply to this source? No
5. Do "National Emission Standards for Hazardous Air Pollutants"  
(NESHAP) apply to this source? No

- H. Do "Reasonably Available Control Technology" (RACT) requirements apply  
to this source? \_\_\_\_\_
- a. If yes, for what pollutants? \_\_\_\_\_
  - b. If yes, in addition to the information required in this form,  
any information requested in Rule 17-2.650 must be submitted.

Attach all supportive information related to any answer of "Yes". Attach any justifi-  
cation for any answer of "No" that might be considered questionable.

D. Control Devices: (See Section V, Item 4) N/A

Name and Type (Model & Serial No.)	Contaminant	Efficiency	Range of Particles Size Collected (in microns) (If applicable)	Basis for Efficiency (Section V Item 5)

E. Fuels

Type (Be Specific)	Consumption*		Maximum Heat Input (MMBTU/hr)
	avg/hr	max./hr	
Natural Gas	0.0524	0.0524	55

\*Units: Natural Gas--MMCF/hr; Fuel Oils--gallons/hr; Coal, wood, refuse, other--lbs/hr.

Fuel Analysis:

Percent Sulfur: nil Percent Ash: nil  
 Density: 0.045 <sup>CF</sup> lbs/gal Typical Percent Nitrogen: > 1%  
 Heat Capacity: 1050 <sup>CF</sup> BTU/lb/°F BTU/gal

Other Fuel Contaminants (which may cause air pollution): \_\_\_\_\_

F. If applicable, indicate the percent of fuel used for space heating. N/A

Annual Average \_\_\_\_\_ Maximum \_\_\_\_\_

G. Indicate liquid or solid wastes generated and method of disposal. N/A



H. Emission Stack Geometry and Flow Characteristics (Provide data for each stack):

Stack Height: 30 ft. Stack Diameter: 4 ft.  
 Gas Flow Rate: 16,900 ACFM          DSCFM Gas Exit Temperature: 450 °F.  
 Water Vapor Content: 8.2 % Velocity: 22.41 FPS

SECTION IV: INCINERATOR INFORMATION N/A

Type of Waste	Type 0 (Plastics)	Type I (Rubbish)	Type II (Refuse)	Type III (Garbage)	Type IV (Pathological)	Type V (Liq. & Gas By-prod.)	Type VI (Solid By-prod.)
Actual lb/hr Incinerated							
Uncontrolled (lbs/hr)							

Description of Waste \_\_\_\_\_

Total Weight Incinerated (lbs/hr) \_\_\_\_\_ Design Capacity (lbs/hr) \_\_\_\_\_

Approximate Number of Hours of Operation per day \_\_\_\_\_ day/wk \_\_\_\_\_ wks/yr. \_\_\_\_\_

Manufacturer \_\_\_\_\_

Date Constructed \_\_\_\_\_ Model No. \_\_\_\_\_

	Volume (ft) <sup>3</sup>	Heat Release (BTU/hr)	Fuel		Temperature (°F)
			Type	BTU/hr	
Primary Chamber					
Secondary Chamber					

Stack Height: \_\_\_\_\_ ft. Stack Diameter: \_\_\_\_\_ Stack Temp. \_\_\_\_\_

Gas Flow Rate: \_\_\_\_\_ ACFM \_\_\_\_\_ DSCFM\* Velocity: \_\_\_\_\_ FPS

\*If 50 or more tons per day design capacity, submit the emissions rate in grains per standard cubic foot dry gas corrected to 50% excess air.

Type of pollution control device:  Cyclone  Wet Scrubber  Afterburner  
 Other (specify) \_\_\_\_\_

Brief description of operating characteristics of control devices:     N/A    

Ultimate disposal of any effluent other than that emitted from the stack (scrubber water, ash, etc.):

    N/A    

NOTE: Items 2, 3, 4, 6, 7, 8, and 10 in Section V must be included where applicable.

**SECTION V: SUPPLEMENTAL REQUIREMENTS**

Please provide the following supplements where required for this application.

1. Total process input rate and product weight -- show derivation [Rule 17-2.100(127)]
2. To a construction application, attach basis of emission estimate (e.g., design calculations, design drawings, pertinent manufacturer's test data, etc.) and attach proposed methods (e.g., FR Part 60 Methods 1, 2, 3, 4, 5) to show proof of compliance with applicable standards. To an operation application, attach test results or methods used to show proof of compliance. Information provided when applying for an operation permit from a construction permit shall be indicative of the time at which the test was made.
3. Attach basis of potential discharge (e.g., emission factor, that is, AP42 test).
4. With construction permit application, include design details for all air pollution control systems (e.g., for baghouse include cloth to air ratio; for scrubber include cross-section sketch, design pressure drop, etc.)
5. With construction permit application, attach derivation of control device(s) efficiency. Include test or design data. Items 2, 3 and 5 should be consistent: actual emissions = potential (1-efficiency).
6. An 8 1/2" x 11" flow diagram which will, without revealing trade secrets, identify the individual operations and/or processes. Indicate where raw materials enter, where solid and liquid waste exit, where gaseous emissions and/or airborne particles are evolved and where finished products are obtained.
7. An 8 1/2" x 11" plot plan showing the location of the establishment, and points of airborne emissions, in relation to the surrounding area, residences and other permanent structures and roadways (Example: Copy of relevant portion of USGS topographic map).
8. An 8 1/2" x 11" plot plan of facility showing the location of manufacturing processes and outlets for airborne emissions. Relate all flows to the flow diagram.

SEE ORIGINAL PERMIT

SEE ORIGINAL PERMIT

9. The appropriate application fee in accordance with Rule 17-4.05. The check should be made payable to the Department of Environmental Regulation.
10. With an application for operation permit, attach a Certificate of Completion of Construction indicating that the source was constructed as shown in the construction permit.

**SECTION VI: BEST AVAILABLE CONTROL TECHNOLOGY**

A. Are standards of performance for new stationary sources pursuant to 40 C.F.R. Part 60 applicable to the source?

Yes  No

Contaminant	Rate or Concentration

B. Has EPA declared the best available control technology for this class of sources (If yes, attach copy)

Yes  No

Contaminant	Rate or Concentration

C. What emission levels do you propose as best available control technology?

Contaminant	Rate or Concentration

D. Describe the existing control and treatment technology (if any).

- |                           |                          |
|---------------------------|--------------------------|
| 1. Control Device/System: | 2. Operating Principles: |
| 3. Efficiency:*           | 4. Capital Costs:        |

\*Explain method of determining

ATTACHMENT A

COCA-COLA FOODS  
PERMIT EMISSION CALCULATIONS  
1300 HP BOILER

NATURAL GAS USAGE:

458,857,560 CF/YR

-----  
NATURAL GAS  
-----

PARTICULATE  
-----

458,857,560 cf/yr. x 0.000002 lbs/c.f. = 917.72 lbs/yr  
OR 0.458858 tons/yr.

S02  
---

458,857,560 cf/yr. x 0.0000006 lbs/c.f. = 275.314536 lbs/yr  
OR 0.137657 tons/yr.

NOX  
---

458,857,560 cf/yr. x 0.00014 lbs/c.f. = 64240.0584 lbs/yr  
OR 32.1200 tons/yr.

CO  
---

458,857,560 cf/yr. x 0.000035 lbs/c.f. = 16060.0146  
OR 8.0300 tons/yr.

HC  
---

458,857,560 gal/yr. x 0.000003 lbs/c.f. = 1376.57268  
OR 0.6883 tons/yr.

**APPLICATION FOR MODIFICATION  
TO PERMIT**

**65M PPH BOILER**

**PREPARED FOR:**

**CUTRALE CITRUS JUICES USA,  
INC.  
LEESBURG, FLORIDA**

**PREPARED BY:**



**ATC**

***AIR TESTING & CONSULTING, INC.***

**333 FALKENBURG ROAD, SUITE B-214  
TAMPA, FLORIDA 33619**

DEP ROUTING AND TRANSMITTAL SLIP

TO: (NAME, OFFICE, LOCATION)

3. be

1. ~~Al Linero~~

4. \_\_\_\_\_

2. Div. of Air Resources Manag-

PLEASE PREPARE REPLY FOR:

- \_\_\_\_ SECRETARY'S SIGNATURE
- \_\_\_\_ DIV/DIST DIR SIGNATURE
- \_\_\_\_ MY SIGNATURE
- \_\_\_\_ YOUR SIGNATURE
- \_\_\_\_ DUE DATE \_\_\_\_\_

ACTION/DISPOSITION

- \_\_\_\_ DISCUSS WITH ME
- \_\_\_\_ COMMENTS/ADVISE
- \_\_\_\_ REVIEW AND RETURN
- \_\_\_\_ SET UP MEETING
- \_\_\_\_ FOR YOUR INFORMATION
- \_\_\_\_ HANDLE APPROPRIATELY
- \_\_\_\_ INITIAL AND FORWARD
- \_\_\_\_ SHARE WITH STAFF
- \_\_\_\_ FOR YOUR FILES

COMMENTS:

Please have a BACT done ASAP. The applicant is in a hurry to install due to citrus season starting soon.

See - Can you look **RECEIVED** at this?

SEP 28 1998

BUREAU OF AIR REGULATION

Might need to locate small boiler BACT

files that Marty had. ae

FROM:

John Turner

DATE:

9/25/98

PHONE:

SC 325-2327

Best Available Control Technology (BACT) Determination  
*Centrale Citrus Juices USA, Inc. - Leesburg Facility*  
Lake County

This BACT determination is required for the source as set forth in the Rule 62-296.406, Florida Administrative Code (F.A.C.), Fossil Fuel Steam Generators with less than 250 Million Btu per hour Heat Input, New and Existing Sources.

Description of Project:

The applicant is proposing to replace an existing natural gas fired 55 mmBtu/hr. boiler (boiler #4), which requires extensive repairs, with a pre-owned 78 mmBtu/hr B & W boiler that was originally constructed in 1987. The existing unit is designated emissions unit 004 at facility 0690002. The existing boiler replaced a smaller boiler in 1991. The construction permit application is being processed by the Central District office. The application and BACT proposal was received in the Bureau of Air Regulation on September 28, 1998.

BACT Determination Requested by Applicant:

The applicant has proposed the use of up to 338 thousand gallons per year of number 6 fuel oil with a sulfur content of 1.5%, with natural gas as an alternate fuel up to 438 million cubic feet per year. The applicant proposed that the amount of fuel oil required if fired with no other fuel is 338 thousand gallons per year, and the amount of natural gas required if fired with no other fuel is 571 million cubic feet per year. The engineer for the applicant by telephone requested the Department consider allowing fuel oil firing to address the applicant's concerns about unexpected gas curtailment by its gas supplier, the City of Leesburg. The applicant's engineer clarified that the applicant is seeking the flexibility to fire fuel oil in the event its gas supply is cut off. Specifically, the applicant desires to fire distillate fuel oil with a sulfur content of up to 0.5% from its existing fuel tanks for short periods of time in the event of a sudden loss of natural gas. The applicant also desires the flexibility to fire very low sulfur distillate fuel oil (with a sulfur content of up to 0.05%) for a longer duration.

BACT Determination by DEP:

Pursuant to Rule 62-296.406, F.A.C., particulate matter and sulfur dioxide emissions shall be limited by the Best Available Control Technology (BACT). BACT is based on the maximum achievable reduction in emissions taking into consideration energy, environmental and economic impacts. BACT for the replacement boiler shall be the use of natural gas, or distillate fuel oil with a sulfur content of 0.05% or less, as the primary fuels. Natural gas shall be limited to 542 million standard cubic feet in any consecutive 12 month period. Instead of firing natural gas, the applicant may fire up to 3.73 million gallons in any consecutive 12 month period of very low sulfur distillate fuel oil with a sulfur content of 0.05% or less. The applicant may also fire up to 229,000 gallons in any consecutive 12 month period of distillate fuel oil with a sulfur content of 0.5% or less, as a backup fuel. Compliance with these limitations shall be verified by maintaining records of the monthly and rolling 12-month natural gas and distillate fuel oil usage, and by maintaining records of distillate fuel oil sulfur content provided by the fuel supplier.

BACT Determination Rationale:

Sulfur in fuel is a primary air pollution concern since most of the fuel sulfur becomes sulfur dioxide. Also, particulate matter emissions from fuel burning are related to the sulfur content. BACT for particulate matter and sulfur dioxide, the two pollutants regulated pursuant to Rule 62-296.406, F.A.C., is generally the use of a very low sulfur fuel such as natural gas. Based on ARMS data and information provided in the application, the

previous boiler was fired solely on natural gas. BACT for a boiler to replace a natural gas boiler cannot be the regular use of fuel oil with a sulfur content higher than 0.05% sulfur. This very low sulfur fuel oil is readily available in Florida. Given that the previous boiler was fired on natural gas, the use of natural gas as a primary fuel for the replacement boiler should not pose a hardship. However, the applicant, through its engineer, requested the opportunity to fire very low sulfur fuel oil, and the ability to continue use of the boiler during periods of unexpected curtailment of its gas supply. The use of very low sulfur distillate oil will provide flexibility to the applicant if it desires to fire fuel oil on a regular basis, while still limiting emissions of SO<sub>2</sub>. The limited use of distillate fuel oil with a sulfur content of 0.5% or less will also provide flexibility to allow the applicant to continue operation of the boiler if the natural gas supply is suddenly curtailed. The amount of this fuel that may be fired is limited so that the emissions increase of SO<sub>2</sub> will be limited. The amounts of natural gas and fuel oil are limited so that the emissions increase of NO<sub>x</sub> will be limited to avoid PSD, as described below. The rolling total limitations are appropriate because citrus processing is a seasonal business with significant monthly variation.

PSD Consideration:

Since the replacement boiler is larger in capacity than the existing boiler, the proposed project must be evaluated for PSD applicability. The larger boiler will result in increased potential emissions. This facility is considered a major facility for PSD, so to evaluate the applicability of PSD for the proposed replacement boiler, a comparison must be made of the emissions increase associated with this project to the PSD significance criteria for major modifications to major facilities. Although it seems appropriate to subtract the past actual emissions from boiler #4 from the future potential emissions of the replacement boiler, this can only be done by including all other contemporaneous increases and decreases in pollutants from all emissions units at the facility. It is easier to limit fuel consumption so that the project, evaluated alone, has emissions increases that are less than the PSD significance criteria. This avoids requiring the applicant to detail emissions increases and decreases at the facility for the past five year period. (As noted in the table below, with the exception of NO<sub>x</sub>, the past actual emissions of air pollutants are not particularly consequential. Thus, excluding these emissions from consideration does not impose notable incremental limitations on fuel usage.)

The following table summarizes the emissions increases associated with this project. Also shown for reference is an estimation of past actual emissions from boiler #4. The Annual Operating Reports show that boiler #4 operated 1276 hours in 1997, and 40 hours in 1996, for an average of 658 hours. Assuming that all operation was at the maximum heat input, for natural gas with a heating value of 1050 Btu/cf, the boiler used an average of 34.5 mmcf per year.

Future potential emissions for natural gas are based on firing 542 mmcf per year of natural gas. The emissions estimates are based on emission factors from EPA's compilation of emission factors, AP-42, section 1.4, Tables 1.4-1 and 1.4-2, corrected for a heating value of 1050 Btu/scf. VOC emissions are based on the TOC emission factor, adjusted to exclude methane.

Future potential emissions for distillate fuel oil are based on firing 3.73 million gallons per year of very low sulfur distillate fuel oil with a sulfur content of 0.05% or less, and 229,000 gallons per year of distillate fuel oil with a sulfur content of 0.5% or less. The emissions estimates are based on emission factors from AP-42, section 1.3, Tables 1.3-1 and 1.3-2 for utility and industrial boilers, respectively. The heating value of distillate fuel oil is assumed to be 136,000 Btu/gallon.



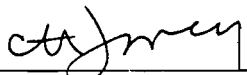
Table: Emissions from proposed project to replace boiler #4 (TPY)

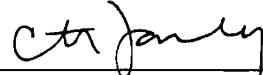
Pollutant	Natural Gas		Fuel Oil	Maximum Net Increase	PSD Significance
	Boiler #4 Past Actual	Future Potential	Future Potential		
Sulfur dioxide	0.01	0.2	21.3	21.3	40
Nitrogen oxides	2.5	39.8	39.6	39.8	40
Carbon monoxide	0.6	9.9	9.9	9.9	100
Particulate matter	0.2	4.0	4.0	4.0	25
Volatile organic compounds	0.05	0.8	0.4	0.8	40

Since the estimated increase for all pollutants from this project, considered alone, is less than the PSD significance criteria, the replacement of boiler #4 is not subject to PSD. The limits on natural gas and fuel oil usage noted in the BACT Determination section above are required to ensure that the net emissions increase does not exceed the PSD significance criteria. These limits should be included in the construction permit and subsequent operation permits.

Details of the analysis may be obtained by contacting:

Joseph Kahn, P.E.  
 Department of Environmental Protection  
 Division of Air Resources Management  
 Mail Station #5505  
 2600 Blair Stone Road  
 Tallahassee, Florida 32399-2400  
 850-921-9519

Recommended by:   
 C. H. Fancy, P.E., Chief  
 Bureau of Air Regulation

Approved by:   
 Howard L. Rhodes, Director  
 Division of Air Resources  
 Management

10/13/98  
 Date

10/13/98  
 Date

P.O. Box 157  
602 McKean Street  
Auburndale, FL 33823  
Tel: 941-965-5000



September 11, 1998

**CERTIFIED MAIL: Z 075 841 102**

Mr. Alan D. Zahm, P.E.  
Department of Environmental Protection  
3319 Maguire Blvd., Suite 232  
Orlando, FL 32803

**Re: Cutrale Citrus Juices USA, Inc. - Leesburg, FL  
Facility No.: 1050023**

Dear Mr. Zahm:

Enclosed are two (2) copies of a permit application for the installation of a B&W 78 mm/Btu/hr boiler to replace the existing 55 mm Btu/hr natural gas fired boiler No. 4, Permit No. AO35-203387. Boiler No. 4 requires extensive repairs to the majority of the tubes and Cutrale Citrus Juices USA, Inc. (Cutrale) has decided to remove it and replace it with a pre-owned B&W unit purchased in North Carolina. The B&W unit was originally constructed in 1987 and is not subject to NSPS. **The boiler can fire either natural gas or fuel oil. Cutrale will fire fuel oil with a maximum of 1.5% S.** This fuel can also be fired in the Cogen System duct burner and the citrus peel dryer through a central fuel oil system.

Attached is a spreadsheet giving three scenarios for the boiler fuel consumption and resulting emissions. Also attached are the emission factors with SCC numbers for both natural gas and fuel oil. The first calculation gives emissions based on burning fuel oil only. The maximum amount of SO<sub>2</sub> emissions is 39.8 TPY. The second calculation gives emissions based on burning natural gas only. The maximum amount of NO<sub>x</sub> emissions is 39.8 TPY. The third calculation gives emissions based on burning the maximum amount of fuel oil (338 Mgal) with natural gas (438 MMCF) making up the difference. The maximum amount of NO<sub>x</sub> and SO<sub>2</sub> emissions are both below 40 TPY.

Cutrale requests that the boiler be permitted to burn up to 338 Mgal of fuel oil with a maximum of 1.5% sulfur or a maximum of 571 MMCF of natural gas. The actual usage for each fuel will probably be lower than the maximum for each. The actual usage for each will be tracked and the total amounts each of NO<sub>x</sub> and SO<sub>2</sub> will be maintained below 40 TPY.

Enclosed with this request is a check for \$2,000 to cover the application fee. Due to the abrupt nature of the existing boiler failure, Cutrale requests that this application for construction be expedited so the replacement boiler is operational by November 1, 1998 (start of fruit season). If you have any questions, please contact me at (941) 965-5209.

Sincerely,  
Cutrale Citrus Juices USA, Inc.

Aaron P. Corkum  
Manager, Technical Services

enclosures

cc: Kenneth Given, P.E. - Stevenson & Associates  
John Bohmann - Cutrale Citrus Juices USA, Inc.  
Chuck Reihl - Cutrale Citrus Juices USA, Inc.



**CUTRALE CITRUS JUICES USA, INC.**

**TABLE I - BOILER EMISSIONS**

**A. USE OF FUEL OIL ONLY**

<b>BOILER EMISSIONS - TONS PER YEAR</b>		<b>MMCF = 0</b>	
		<b>MGAL = 338</b>	
PM =	0.00	3.04	3.04
SO <sub>x</sub> =	0.00	39.80	39.80
NO <sub>x</sub> =	0.00	9.30	9.30
VOC =	0.00	0.05	0.05
CO =	0.00	0.85	0.85

**B. USE OF NATURAL GAS ONLY**

<b>BOILER EMISSIONS - TONS PER YEAR</b>		<b>MMCF = 571</b>	
		<b>MGAL = 0</b>	
PM =	0.86	0.00	0.86
SO <sub>x</sub> =	0.17	0.00	0.17
NO <sub>x</sub> =	39.97	0.00	39.97
VOC =	0.80	0.00	0.80
CO =	9.99	0.00	9.99

**C. USE OF NATURAL GAS AND FUEL OIL**

<b>BOILER EMISSIONS - TONS PER YEAR</b>		<b>MMCF = 438</b>	
		<b>MGAL = 338</b>	
PM =	0.66	3.04	3.70
SO <sub>x</sub> =	0.13	39.80	39.93
NO <sub>x</sub> =	30.66	9.30	39.96
VOC =	0.61	0.05	0.66
CO =	7.67	0.85	8.51

**CUTRALE CITRUS JUICES USA, INC.  
EMISSION FACTORS**

**DRYER**

<b>Natural Gas:</b>		<b>SCC: 1-02-006-02</b>		
PM =		lbs/ton x	tons/yr x	Ton/2000 lb
SOx =	0.6	lbs/MMCF x	MMCF x	Tons/2000 lb
NOx =	140	lbs/MMCF x	MMCF x	Tons/2000 lb
VOC =	4.814	lbs/MMCF x	MMCF x	Tons/2000 lb
CO =	35	lbs/MMCF x	MMCF x	Tons/2000 lb

<b>#6 Fuel Oil:</b>		<b>SCC: 1-02-004-01</b>		
		%S = 1.5	% EFF = 50	
PM =		lbs/ton x	tons/yr x	Ton/2000 lb
SOx =	(%S)x 157	lbs/MGal x	MGal x	Tons/2000 lb
NOx =	55	lbs/MGal x	MGal x	Tons/2000 lb
VOC =	0.28	lbs/MGal x	MGal x	Tons/2000 lb
CO =	5	lbs/MGal x	MGal x	Tons/2000 lb

**TURBINE**

<b>Natural Gas:</b>		<b>SCC: 2-01-002-01</b>		
PM =	19.9	lbs/MMCF x	MMCF x	Tons/2000 lb
SOx =	0.6	lbs/MMCF x	MMCF x	Tons/2000 lb
NOx =	453.2	lbs/MMCF x	MMCF x	Tons/2000 lb
VOC =	24.7	lbs/MMCF x	MMCF x	Tons/2000 lb
CO =	113.3	lbs/MMCF x	MMCF x	Tons/2000 lb

<b>#2 Fuel Oil:</b>		<b>SCC: 2-01-001-01</b>		
		%S = 0.5		
PM =	5	lbs/MGal x	MGal x	Tons/2000 lb
SOx =	(%S)x 140	lbs/MGal x	MGal x	Tons/2000 lb
NOx =	67.8	lbs/MGal x	MGal x	Tons/2000 lb
VOC =	4.77	lbs/MGal x	MGal x	Tons/2000 lb
CO =	15.4	lbs/MGal x	MGal x	Tons/2000 lb

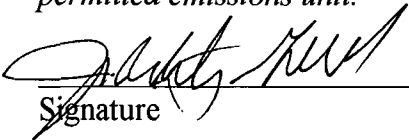
**DUCT BURNER/BOILER**

<b>Natural Gas:</b>		<b>SCC: 1-02-006-02</b>		
PM =	3	lbs/MMCF x	MMCF x	Tons/2000 lb
SOx =	0.6	lbs/MMCF x	MMCF x	Tons/2000 lb
NOx =	140	lbs/MMCF x	MMCF x	Tons/2000 lb
VOC =	2.8	lbs/MMCF x	MMCF x	Tons/2000 lb
CO =	35	lbs/MMCF x	MMCF x	Tons/2000 lb

<b>#6 Fuel Oil:</b>		<b>SCC: 1-02-004-01</b>		
		%S = 1.5		
PM =	%S x 12	lbs/MGal x	MGal x	Tons/2000 lb
SOx =	(%S)x 157	lbs/MGal x	MGal x	Tons/2000 lb
NOx =	55	lbs/MGal x	MGal x	Tons/2000 lb
VOC =	0.28	lbs/MGal x	MGal x	Tons/2000 lb
CO =	5	lbs/MGal x	MGal x	Tons/2000 lb



**Owner/Authorized Representative or Responsible Official**

1. Name and Title of Owner/Authorized Representative or Responsible Official: <b>James Fitzgerald / Director, Leesburg Operations</b>
2. Owner/Authorized Representative or Responsible Official Mailing Address:  Organization/Firm: <b>Cutrale Citrus Juices USA, Inc.</b> Street Address or Other Locator: <b>11 Cloud Street</b> City: <b>Leesburg</b> County: <b>Lake</b> Zip Code: <b>34748</b>
3. Owner/Authorized Representative or Responsible Official Telephone Numbers: Telephone: <b>(352) 728-7800</b> Fax: <b>(352) 728-7840</b>
4. Owner/Authorized Representative or Responsible Official Statement:  <i>I, the undersigned, am the owner or authorized representative* of the non-Title V source addressed in this Application for Air Permit or the responsible official, as defined in Rule 62-210.200, F.A.C., of the Title V source addressed in this application, whichever is applicable. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof. I understand that a permit, if granted by the Department, cannot be transferred without authorization from the Department, and I will promptly notify the Department upon sale or legal transfer of any permitted emissions unit.</i>   Signature _____ Date <u>9/10/98</u>

\* Attach letter of authorization if not currently on file.

**Scope of Application**

This Application for Air Permit addresses the following emissions unit(s) at the facility. An Emissions Unit Information Section (a Section III of the form) must be included for each emissions unit listed.

<b>Emissions Unit ID</b>	<b>Description of Emissions Unit</b>	<b>Permit Type</b>
	Process Steam Boiler	AC1D

**Purpose of Application and Category**

Check one (except as otherwise indicated):

**Category I: All Air Operation Permit Applications Subject to Processing Under Chapter 62-213, F.A.C.**

This Application for Air Permit is submitted to obtain:

- Initial air operation permit under Chapter 62-213, F.A.C., for an existing facility which is classified as a Title V source.
- Initial air operation permit under Chapter 62-213, F.A.C., for a facility which, upon start up of one or more newly constructed or modified emissions units addressed in this application, would become classified as a Title V source.

Current construction permit number: \_\_\_\_\_

- Air operation permit renewal under Chapter 62-213, F.A.C., for a Title V source.

Operation permit to be renewed: \_\_\_\_\_

- Air operation permit revision for a Title V source to address one or more newly constructed or modified emissions units addressed in this application.

Current construction permit number: \_\_\_\_\_

Operation permit to be revised: \_\_\_\_\_

- Air operation permit revision or administrative correction for a Title V source to address one or more proposed new or modified emissions units and to be processed concurrently with the air construction permit application. Also check Category III.

Operation permit to be revised/corrected: \_\_\_\_\_

- Air operation permit revision for a Title V source for reasons other than construction or modification of an emissions unit. Give reason for the revision; e.g., to comply with a new applicable requirement or to request approval of an "Early Reductions" proposal.

Operation permit to be revised: \_\_\_\_\_

Reason for revision: \_\_\_\_\_

\_\_\_\_\_



**Category II: All Air Operation Permit Applications Subject to Processing Under Rule 62-210.300(2)(b), F.A.C.**

This Application for Air Permit is submitted to obtain:

- Initial air operation permit under Rule 62-210.300(2)(b), F.A.C., for an existing facility seeking classification as a synthetic non-Title V source.

Current operation/construction permit number(s): \_\_\_\_\_

- Renewal air operation permit under Rule 62-210.300(2)(b), F.A.C., for a synthetic non-Title V source.

Operation permit to be renewed: \_\_\_\_\_

- Air operation permit revision for a synthetic non-Title V source. Give reason for revision; e.g., to address one or more newly constructed or modified emissions units.

Operation permit to be revised: \_\_\_\_\_

Reason for revision: \_\_\_\_\_

**Category III: All Air Construction Permit Applications for All Facilities and Emissions Units**

This Application for Air Permit is submitted to obtain:

- Air construction permit to construct or modify one or more emissions units within a facility (including any facility classified as a Title V source).

Current operation permit number(s), if any: \_\_\_\_\_

- Air construction permit to make federally enforceable an assumed restriction on the potential emissions of one or more existing, permitted emissions units.

Current operation permit number(s): \_\_\_\_\_

- Air construction permit for one or more existing, but unpermitted, emissions units.

**Application Processing Fee**

Check one:

Attached - Amount: \$2,000

Not Applicable.

**Construction/Modification Information**

1. Description of Proposed Project or Alterations:

Removal of existing damaged Boiler #4, rated at 55 MMBtu/hr and replacement with preowned 1987 B&W 78MMBTU/HR boiler. The new boiler will fire either natural gas or fuel oil with 1.5 % S.

2. Projected or Actual Date of Commencement of Construction:

10/1/98

3. Projected Date of Completion of Construction:

11/15/98

**Professional Engineer Certification**

1. Professional Engineer Name: **Kenneth E. Given**

Registration Number: **23203**

2. Professional Engineer Mailing Address:

Organization/Firm: **Stevenson & Associates**

Street Address: **333 Falkenburg Rd. N. B-214**

City: **Tampa**

State: **Florida**

Zip Code: **33619**

3. Professional Engineer Telephone Numbers:

Telephone: **( 813 ) 651 - 0878**

Fax: **( 813 ) 653 - 9082**

4. Professional Engineer Statement:

*I, the undersigned, hereby certify, except as particularly noted herein\*, that:*

*(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this Application for Air Permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and*

*(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.*

*If the purpose of this application is to obtain a Title V source air operation permit (check here [ ] if so), I further certify that each emissions unit described in this Application for Air Permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance schedule is submitted with this application.*

*If the purpose of this application is to obtain an air construction permit for one or more proposed new or modified emissions units (check here [ X ] if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.*

*If the purpose of this application is to obtain an initial air operation permit or operation permit revision for one or more newly constructed or modified emissions units (check here [ ] if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.*



*Signature*  
*Robert L. Luen*

*Date*  
*9/8/98*







## B. FACILITY REGULATIONS

**List of Applicable Regulations** (Required for Category I applications and Category III applications involving Title-V sources. See Instructions.)

<b>Federal:</b>	
<b>State:</b> 62-4, F.A.C.	Permitting Requirements
62-210.350(1)(a)(1) , F.A.C.	Public Notice for Construction Permit
62-297.401, F.A.C.	EPA Test Procedures
62-210.700, F.A.C.	Excess Emissions
62-297.620, F.A.C.	Exceptions and Approval of Alternate Procedures and Requirements
62-297.310, F.A.C.	General Test Requirements
62-297.400, F.A.C.	EPA Methods Adopted by Reference
Title V Core List	Major Facility Regulations - effective 3/25/96 as issued by DEP (copy attached)
<b>Local:</b> None	

### C. FACILITY POLLUTANTS

#### Facility Pollutant Information

1. Pollutant Emitted	2. Pollutant Classification
PM	A
SO <sub>2</sub>	A
NO <sub>x</sub>	A
VOC	A
CO	A



**D. FACILITY POLLUTANT DETAIL INFORMATION**

**Facility Pollutant Detail Information:** Pollutant \_\_\_\_ of \_\_\_\_

1. Pollutant Emitted:		
2. Requested Emissions Cap:	(lb/hour)	(tons/year)
3. Basis for Emissions Cap Code:		
4. Facility Pollutant Comment (limit to 400 characters):		

**Facility Pollutant Detail Information:** Pollutant \_\_\_\_ of \_\_\_\_

1. Pollutant Emitted:		
2. Requested Emissions Cap:	(lb/hour)	(tons/year)
3. Basis for Emissions Cap Code:		
4. Facility Pollutant Comment (limit to 400 characters):		

## E. FACILITY SUPPLEMENTAL INFORMATION

### Supplemental Requirements for All Applications

1. Area Map Showing Facility Location: <input checked="" type="checkbox"/> Attached, Document ID: <u>01</u> <input type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
2. Facility Plot Plan: <input checked="" type="checkbox"/> Attached, Document ID: <u>02</u> <input type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
3. Process Flow Diagram(s): <input checked="" type="checkbox"/> Attached, Document ID: <u>03</u> <input type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
4. Precautions to Prevent Emissions of Unconfined Particulate Matter: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
5. Fugitive Emissions Identification: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
6. Supplemental Information for Construction Permit Application: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

### Additional Supplemental Requirements for Category I Applications Only

7. List of Proposed Exempt Activities: <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
8. List of Equipment/Activities Regulated under Title VI:  <input type="checkbox"/> Attached, Document ID: _____  <input type="checkbox"/> Equipment/Activities On site but Not Required to be Individually Listed  <input type="checkbox"/> Not Applicable
9. Alternative Methods of Operation: <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
10. Alternative Modes of Operation (Emissions Trading): <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable

11. Identification of Additional Applicable Requirements:

Attached, Document ID: \_\_\_\_\_  Not Applicable

12. Compliance Assurance Monitoring Plan:

Attached, Document ID: \_\_\_\_\_  Not Applicable

13. Risk Management Plan Verification:

Plan Submitted to Implementing Agency - Verification Attached,  
Document ID: \_\_\_\_\_

Plan to be Submitted to Implementing Agency by Required Date

Not Applicable

14. Compliance Report and Plan:

Attached, Document ID: \_\_\_\_\_  Not Applicable

15. Compliance Certification (Hard-copy Required):

Attached, Document ID: \_\_\_\_\_  Not Applicable

### III. EMISSIONS UNIT INFORMATION

A separate Emissions Unit Information Section (including subsections A through L as required) must be completed for each emissions unit addressed in this Application for Air Permit. If submitting the application form in hard copy, indicate, in the space provided at the top of each page, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application. Some of the subsections comprising the Emissions Unit Information Section of the form are intended for regulated emissions units only. Others are intended for both regulated and unregulated emissions units. Each subsection is appropriately marked.

#### A. TYPE OF EMISSIONS UNIT (Regulated and Unregulated Emissions Units)

##### Type of Emissions Unit Addressed in This Section

1. Regulated or Unregulated Emissions Unit? Check one:

The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.

The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.

2. Single Process, Group of Processes, or Fugitive Only? Check one:

This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).

This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.

This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.

**B. GENERAL EMISSIONS UNIT INFORMATION  
(Regulated and Unregulated Emissions Units)**

**Emissions Unit Description and Status**

1. Description of Emissions Unit Addressed in This Section (limit to 60 characters): Natural gas or fuel oil fired Boiler		
2. Emissions Unit Identification Number: [ X ] No Corresponding ID [ ] Unknown		
3. Emissions Unit Status Code: C	4. Acid Rain Unit? [ ] Yes [ X ] No	5. Emissions Unit Major Group SIC Code: 20
6. Emissions Unit Comment (limit to 500 characters):		

**Emissions Unit Control Equipment**

**A.**

1. Description (limit to 200 characters):  None
2. Control Device or Method Code:



**D. EMISSIONS UNIT REGULATIONS  
(Regulated Emissions Units Only)**

**List of Applicable Regulations** (Required for Category I applications and Category III applications involving Title-V sources. See Instructions.)

<b>Federal:</b>	None	
<b>State:</b>	62-296.406(2)	Fossil Fuel Steam Generators - < 250 MMBtu/hr input - PM Standard
	62-296.406(3)	Fossil Fuel Steam Generators - < 250 MMBtu/hr input - SO <sub>2</sub> Standard
	62-296.406(1)	Visible Emissions Standard
<b>Local:</b>	None	

**E. EMISSION POINT (STACK/VENT) INFORMATION  
(Regulated Emissions Units Only)**

**Emission Point Description and Type**

1. Identification of Point on Plot Plan or Flow Diagram: Boiler	
2. Emission Point Type Code: <input checked="" type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4	
3. Descriptions of Emissions Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point): N/A	
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common: N/A	
5. Discharge Type Code: <input type="checkbox"/> D <input type="checkbox"/> F <input type="checkbox"/> H <input type="checkbox"/> P <input type="checkbox"/> R <input checked="" type="checkbox"/> V <input type="checkbox"/> W	
6. Stack Height:	25 feet
7. Exit Diameter:	6 feet
8. Exit Temperature:	500 (max.) °F



Emissions Unit Information Section 1 of 1

9. Actual Volumetric Flow Rate:	26,000	acfm
10. Percent Water Vapor :		%
11. Maximum Dry Standard Flow Rate:		dscfm
12. Nonstack Emission Point Height:		feet
13. Emission Point UTM Coordinates: Zone: East (km): North (km):		
14. Emission Point Comment (limit to 200 characters):		

**F. SEGMENT (PROCESS/FUEL) INFORMATION  
(Regulated and Unregulated Emissions Units)**

**Segment Description and Rate:** Segment  1  of  2

1. Segment Description (Process/Fuel Type and Associated Operating Method/Mode) (limit to 500 characters): Boiler fired with natural gas	
2. Source Classification Code (SCC): 1-02-006-02	
3. SCC Units: MMCF Burned	
4. Maximum Hourly Rate: 0.074	5. Maximum Annual Rate: 438
6. Estimated Annual Activity Factor:	
7. Maximum Percent Sulfur:	8. Maximum Percent Ash:
9. Million Btu per SCC Unit: 1050	
10. Segment Comment (limit to 200 characters):	

**Segment Description and Rate:** Segment  2  of  2

1. Segment Description (Process/Fuel Type and Associated Operating Method/Mode) (limit to 500 characters): Boiler fired with fuel oil with a maximum of 1.5% sulfur	
2. Source Classification Code (SCC): 1-02-004-01	
3. SCC Units: MGAL Burned	
4. Maximum Hourly Rate: 0.052	5. Maximum Annual Rate: 335
6. Estimated Annual Activity Factor:	
7. Maximum Percent Sulfur: 1.5	8. Maximum Percent Ash: 0.05
9. Million Btu per SCC Unit: 150	
10. Segment Comment (limit to 200 characters):	



**H. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION**  
**(Regulated Emissions Units Only - Emissions Limited Pollutants Only)**

**Pollutant Detail Information:** Pollutant \_\_\_\_\_ of \_\_\_\_\_

1. Pollutant Emitted:		
2. Total Percent Efficiency of Control:		%
3. Potential Emissions:	lb/hour	tons/year
4. Synthetically Limited? <input type="checkbox"/> Yes <input type="checkbox"/> No		
5. Range of Estimated Fugitive/Other Emissions: <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3      _____ to _____ tons/year		
6. Emission Factor: Reference:		
7. Emissions Method Code: <input type="checkbox"/> 0 <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5		
8. Calculation of Emissions (limit to 600 characters):		
9. Pollutant Potential/Estimated Emissions Comment (limit to 200 characters):		

**Allowable Emissions** (Pollutant identified on front of page)

**A.**

1. Basis for Allowable Emissions Code:		
2. Future Effective Date of Allowable Emissions:		
3. Requested Allowable Emissions and Units:		
4. Equivalent Allowable Emissions:	lb/hour	tons/year
5. Method of Compliance (limit to 60 characters):		
6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode) (limit to 200 characters):		

**I. VISIBLE EMISSIONS INFORMATION**  
**(Regulated Emissions Units Only)**

**Visible Emissions Limitation:** Visible Emissions Limitation 1 of 1

1. Visible Emissions Subtype: VE20			
2. Basis for Allowable Opacity:		<input checked="" type="checkbox"/> Rule	<input type="checkbox"/> Other
3. Requested Allowable Opacity:			
Normal Conditions:	20%	Exceptional Conditions:	27 %
Maximum Period of Excess Opacity Allowed:			6 min/hour
4. Method of Compliance: EPA Method 9			
5. Visible Emissions Comment (limit to 200 characters):			
62-296.406(1) F.A.C.			

**J. CONTINUOUS MONITOR INFORMATION**  
**(Regulated Emissions Units Only)**

**Continuous Monitoring System:** Continuous Monitor \_\_\_\_\_ of \_\_\_\_\_

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information: Manufacturer: Model Number:	Serial Number:
5. Installation Date:	
6. Performance Specification Test Date:	
7. Continuous Monitor Comment (limit to 200 characters):	



**K. PREVENTION OF SIGNIFICANT DETERIORATION (PSD) INCREMENT  
TRACKING INFORMATION  
(Regulated and Unregulated Emissions Units)**

**PSD Increment Consumption Determination**

1. Increment Consuming for Particulate Matter or Sulfur Dioxide?

If the emissions unit addressed in this section emits particulate matter or sulfur dioxide, answer the following series of questions to make a preliminary determination as to whether or not the emissions unit consumes PSD increment for particulate matter or sulfur dioxide. Check the first statement, if any, that applies and skip remaining statements.

- ] The emissions unit is undergoing PSD review as part of this application, or has undergone PSD review previously, for particulate matter or sulfur dioxide. If so, emissions unit consumes increment.
  
- ] The facility addressed in this application is classified as an EPA major source pursuant to paragraph (c) of the definition of "major source of air pollution" in Chapter 62-213, F.A.C., and the emissions unit addressed in this section commenced (or will commence) construction after January 6, 1975. If so, baseline emissions are zero, and emissions unit consumes increment.
  
- ] The facility addressed in this application is classified as an EPA major source, and the emissions unit began initial operation after January 6, 1975, but before December 27, 1977. If so, baseline emissions are zero, and emissions unit consumes increment.
  
- ] For any facility, the emissions unit began (or will begin) initial operation after December 27, 1977. If so, baseline emissions are zero, and emissions unit consumes increment.
  
- ] None of the above apply. If so, the baseline emissions of the emissions unit are nonzero. In such case, additional analysis, beyond the scope of this application, is needed to determine whether changes in emissions have occurred (or will occur) after the baseline date that may consume or expand increment.

**Emissions Unit Information Section 1 of 1**

**2. Increment Consuming for Nitrogen Dioxide?**

If the emissions unit addressed in this section emits nitrogen oxides, answer the following series of questions to make a preliminary determination as to whether or not the emissions unit consumes PSD increment for nitrogen dioxide. Check first statement, if any, that applies and skip remaining statements.

- ] The emissions unit addressed in this section is undergoing PSD review as part of this application, or has undergone PSD review previously, for nitrogen dioxide. If so, emissions unit consumes increment.
- ] The facility addressed in this application is classified as an EPA major source pursuant to paragraph (c) of the definition of "major source of air pollution" in Chapter 62-213, F.A.C., and the emissions unit addressed in this section commenced (or will commence) construction after February 8, 1988. If so, baseline emissions are zero, and emissions unit consumes increment.
- ] The facility addressed in this application is classified as an EPA major source, and the emissions unit began initial operation after February 8, 1988, but before March 28, 1988. If so, baseline emissions are zero, and emissions unit consumes increment.
- ] For any facility, the emissions unit began (or will begin) initial operation after March 28, 1988. If so, baseline emissions are zero, and emissions unit consumes increment.
- ] None of the above apply. If so, the baseline emissions of the emissions unit are nonzero. In such case, additional analysis, beyond the scope of this application, is needed to determine whether changes in emissions have occurred (or will occur) after the baseline date that may consume or expand increment.

<b>3. Increment Consuming/Expanding Code:</b>				
PM	<input checked="" type="checkbox"/> C	<input type="checkbox"/> E	<input type="checkbox"/> Unknown	
SO2	<input checked="" type="checkbox"/> C	<input type="checkbox"/> E	<input type="checkbox"/> Unknown	
NO2	<input checked="" type="checkbox"/> C	<input type="checkbox"/> E	<input type="checkbox"/> Unknown	
<b>4. Baseline Emissions:</b>				
PM	0	lb/hour		tons/year
SO2	0	lb/hour		tons/year
NO2			0	tons/year
<b>5. PSD Comment (limit to 200 characters):</b>				

**L. EMISSIONS UNIT SUPPLEMENTAL INFORMATION  
(Regulated Emissions Units Only)**

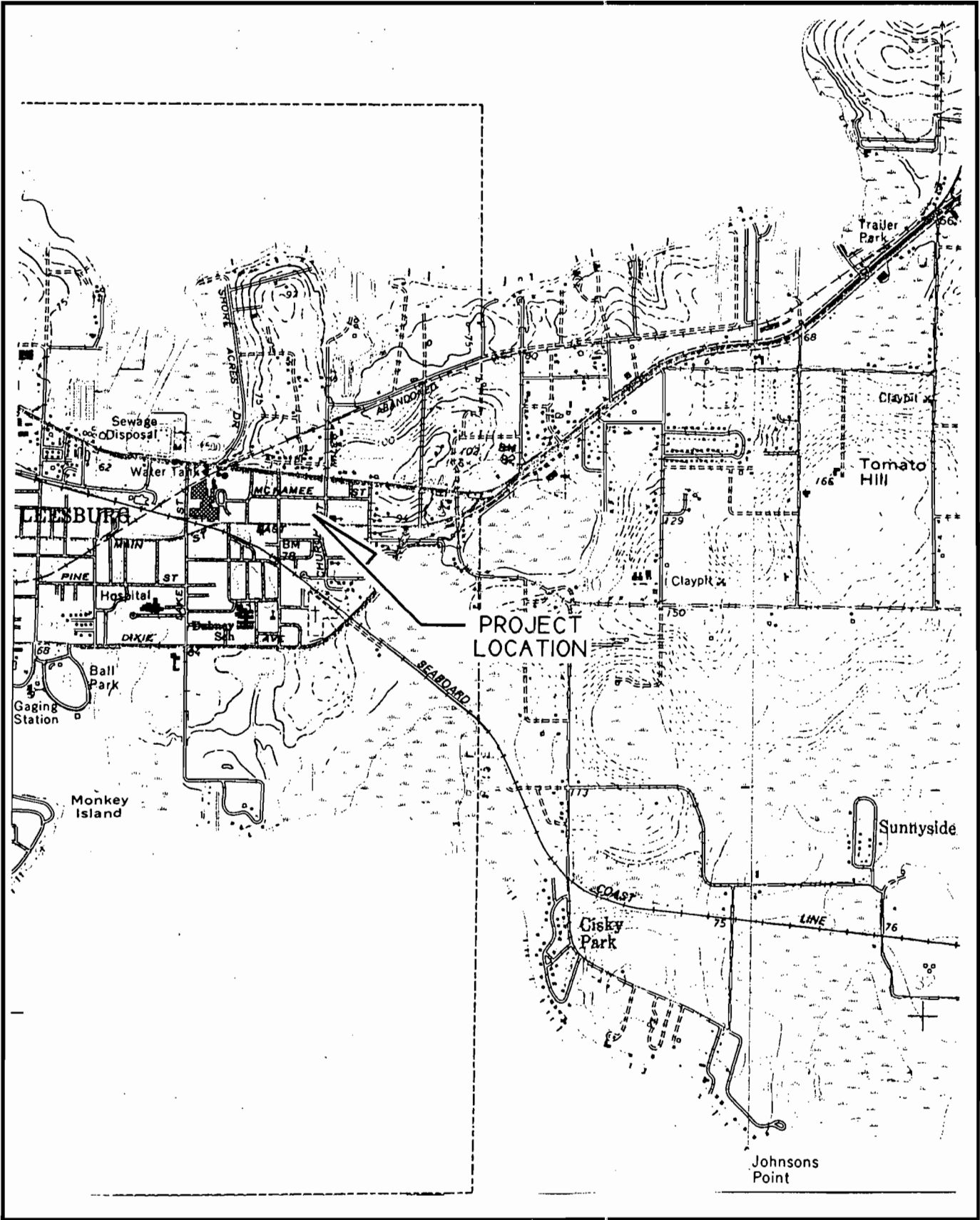
**Supplemental Requirements for All Applications**

1. Process Flow Diagram <input checked="" type="checkbox"/> Attached, Document ID: <u> 01 </u> <input type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
2. Fuel Analysis or Specification <input checked="" type="checkbox"/> Attached, Document ID: <u> 04 </u> <input type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
3. Detailed Description of Control Equipment <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
4. Description of Stack Sampling Facilities <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
5. Compliance Test Report <input type="checkbox"/> Attached, Document ID: _____  <input type="checkbox"/> Previously submitted, Date: _____  <input checked="" type="checkbox"/> Not Applicable
6. Procedures for Startup and Shutdown <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
7. Operation and Maintenance Plan <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
8. Supplemental Information for Construction Permit Application <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
9. Other Information Required by Rule or Statute <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

**Additional Supplemental Requirements for Category I Applications Only**

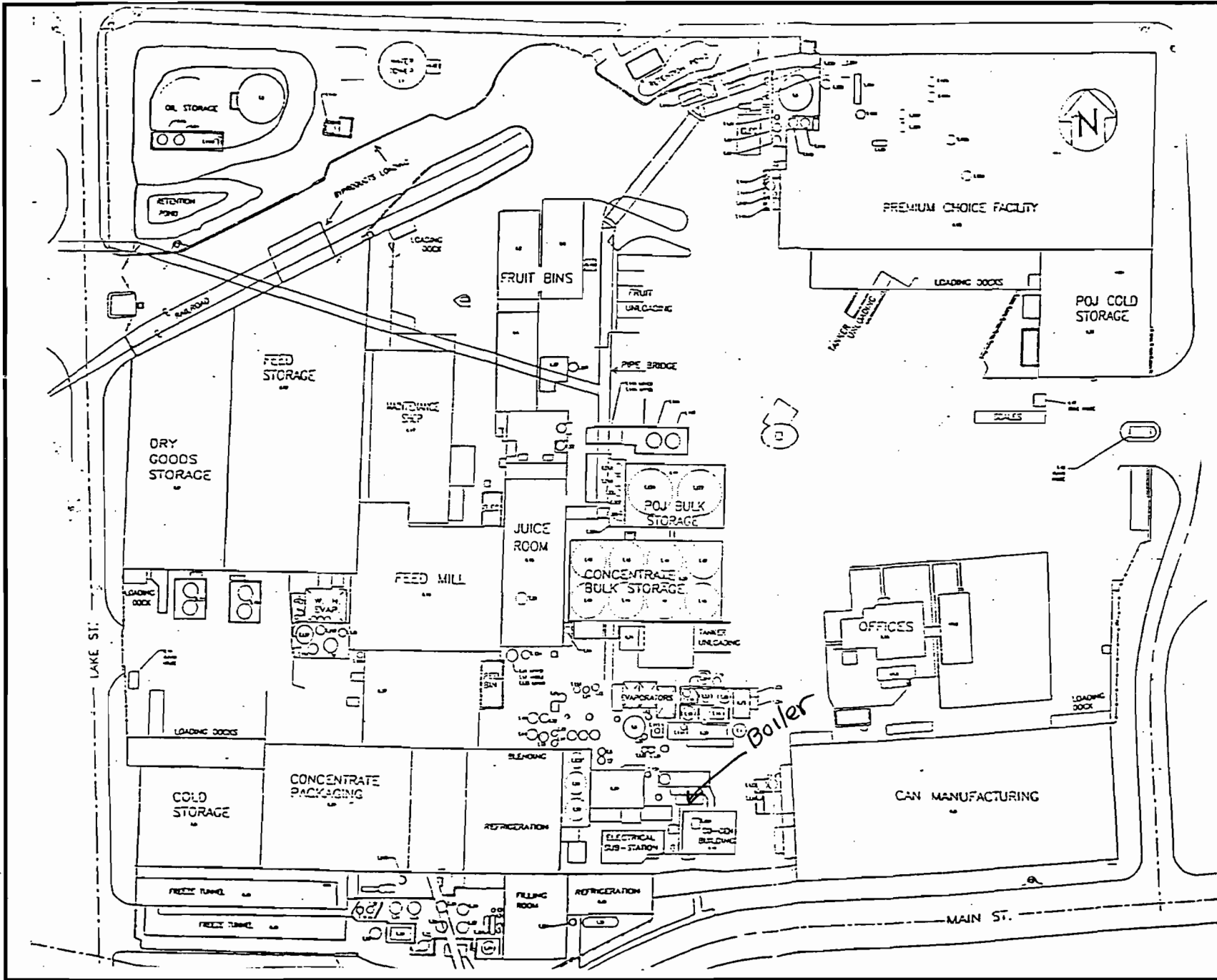
10. Alternative Methods of Operation <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
11. Alternative Modes of Operation (Emissions, Trading) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
12. Identification of Additional Applicable Requirements <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
13. Compliance Assurance Monitoring Plan <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
14. Acid Rain Application (Hard-copy Required)  <input type="checkbox"/> Acid Rain Part - Phase II (Form No. 62-210.900(1)(a)) Attached, Document ID: _____  <input type="checkbox"/> Repowering Extension Plan (Form No. 62-210.900(1)(a)1.) Attached, Document ID: _____  <input type="checkbox"/> New Unit Exemption (Form No. 62-210.900(1)(a)2.) Attached, Document ID: _____  <input type="checkbox"/> Retired Unit Exemption (Form No. 62-210.900(1)(a)3.) Attached, Document ID: _____  <input type="checkbox"/> Not Applicable

**01 - AREA MAP**



CUTRALE CITRUS JUICES USA - AREA MAP

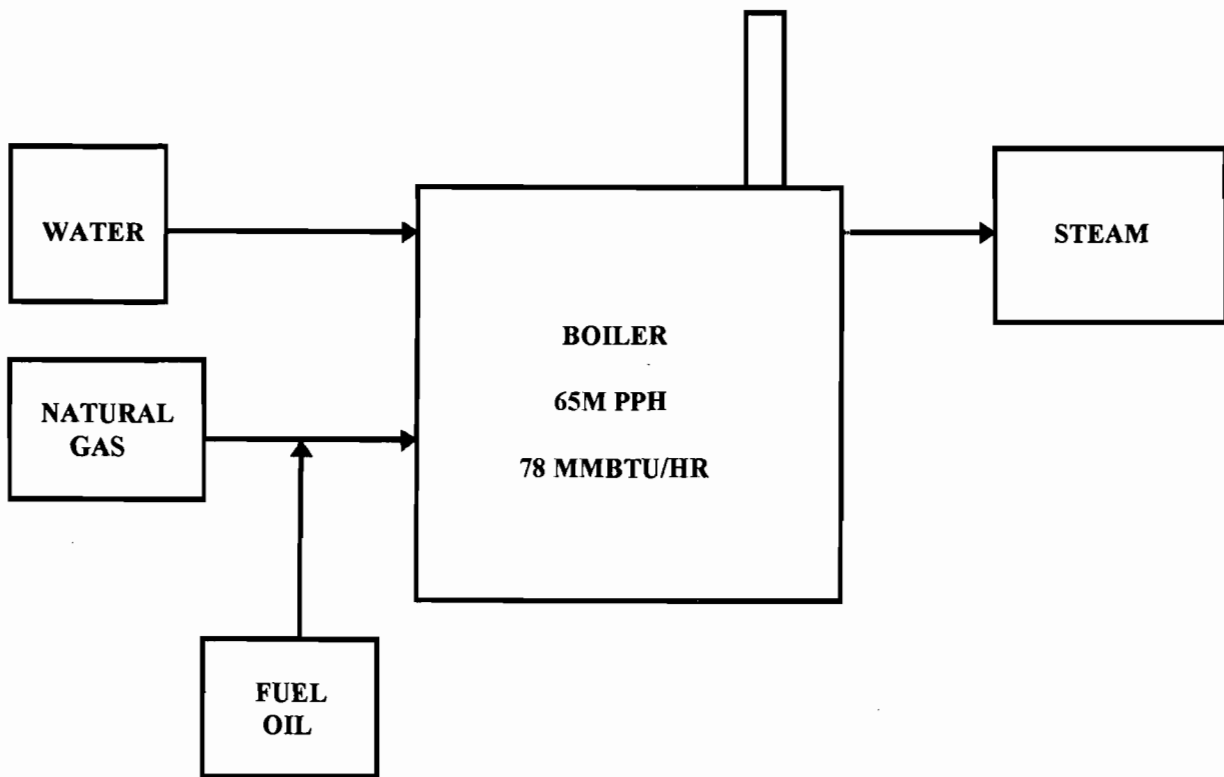
**02 - FACILITY PLOT PLAN**



CUTRALE CITRUS JUICES USA - FACILITY PLOT PLAN



**03 - PROCESS FLOW DIAGRAM**



CUTRALE CITRUS JUICES, USA  
LEESBURG FACILITY  
BOILER FLOW DIAGRAM

**04 - FUEL SPECIFICATION**

**Spot Analysis of Natural Gas for Delivery in Florida**

(Brooker Chromatograph)

DATE: August 27, 1998

TIME: 10:04

Component NameMole %

Hexane	0.104
Propane	0.698
Isobutane	0.162
n-Butane	0.152
Isopentane	0.059
n-Pentane	0.037
Nitrogen	0.349
Methane	94.655
CO <sub>2</sub>	0.800
Ethane	2.981
Totals	100.000

Dry Btu/cf @ 14.730 psia and 60 degrees F = 1050.6

Real Relative Density = 0.5946

Total Sulfur	4.10 PPM
H <sup>2</sup> S	2.00 PPM
H <sup>2</sup> O	2.43 lb/MMcf



central company, inc.

PETROLEUM PRODUCTS

February 15, 1996

Mr. Boyd Robertson  
Coca Cola Foods  
P.O. Box 247  
Auburndale, FL. 33823  
Fax: 813-965-5195

Dear Mr. Robertson:

We appreciate your continuing interest in petroleum products, and value Coca Cola Foods as a long-standing customer. We have researched our test report records for the year 1994, and located the analysis you have requested. Based on this information, we would provide the following specifications:

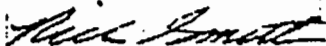
1.5% Maximum Sulfur No. 6 Fuel Oil

API Gravity: 12.18 @ 60 Degrees F  
Viscosity: 207.4 @ 122 Degrees F  
Flash Point: 167 Degrees F  
Pour Point: 30 Degrees F  
Sulfur, Wt., %: 1.49

Please find the enclosed laboratory test reports for 3.68% High Sulfur and 0.95% Low Sulfur No. 6 fuel oils. These products are blended in a ratio of 19.7% High Sulfur No. 6 (3.68%) to 80.3% Low Sulfur No. 6 (0.95%), to yield a resultant 1.49% sulfur product.

If we may be of further assistance in regard to fuel oils, please contact our offices at (813) 248-2105.

Sincerely,



Rick Smith  
Division Manager  
Heavy Products