



Florida Department of Environmental Regulation

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

Bob Martinez, Governor

Dale Twachtman, Secretary

John Shearer, Assistant Secretary

PERMITTEE:
Tropicana Products, Inc.
P. O. Box 338
Bradenton, FL 33506

Permit Number: AC 41-157745
PSD-FL-136
Expiration Date: 12/1/91
County: Manatee
Latitude/Longitude: 27°31'05"
82°32'47"
Project: Gas Turbine with
Heat Recovery Steam Generator

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rule(s) 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 drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

For the construction of a natural gas fired General Electric (GE) LM 5000 turbine with a maximum heat input capacity of 425.5 MMBtu/hr, and a natural gas-fired Heat Recovery Steam Generator (HRSG) with a maximum heat input capacity of 104 MMBtu/hr. The cogeneration project will have an electric generation capacity of 45.4 MW. The project will be located at Tropicana's facility in Bradenton, Manatee County, Florida.

The UTM coordinates of this facility are Zone 17, 346.8 km East, and 3040.9 km North.

The source shall be 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. Tropicana's application package received on November 30, 1988.
2. DER's letter dated December 28, 1988.
3. EPA's letter received December 30, 1988.
4. Tropicana's response received January 13, 1989.
5. DER's Preliminary Determination dated March 21, 1989.

PERMITTEE:
Tropicana Products, Inc.

Permit Number: AC 41-157745
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Expiration Date: 12/1/91

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and as such are binding upon the permittee and enforceable pursuant to the authority of Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is hereby placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.
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. Nor 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 does not constitute 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, plant or aquatic life or property and penalties therefor caused by the construction or operation of this permitted source, 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.

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GENERAL CONDITIONS:

6. The permittee shall at all times 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, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purpose of:

- a. Having access to and copying any records that must be kept under the conditions of the permit;
- b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sampling or monitoring 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 notify and provide the Department with the following information:

- a. a description of and cause of non-compliance; and
- b. the period of noncompliance, including exact 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.

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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 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 arising under the Florida Statutes or Department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes.

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 17-4.12 and 17-30.30, 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 is required to be kept at the work site of the permitted activity during the entire period of construction or operation.

13. This permit also constitutes:

- (x) Determination of Best Available Control Technology (BACT)
- (x) Determination of Prevention of Significant Deterioration (PSD)
- (x) Compliance with New Source Performance Standards

14. The permittee shall comply with the following monitoring and record keeping requirements:

- a. Upon request, the permittee shall furnish all records and plans required under Department rules. The retention period for all records will be extended automatically, unless otherwise stipulated by the Department, during the course of any unresolved enforcement action.

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GENERAL CONDITIONS:

b. The permittee shall retain at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be 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 date(s) 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 submitted or corrected promptly.

SPECIFIC CONDITIONS:

1. The gas turbine (GT)/heat recovery steam generator (HRSG) may operate continuously i.e., 8760 hours/year.

2. The GT/HRSG shall fire only natural gas. The maximum heat input shall not exceed 425.5 MMBtu/hr (405.3 MMCF/hr of gas) for the GT, and 104 MMBtu/hr (99 MMCF/hr of gas) for the HRSG. Heat input to the HRSG on a 30 day rolling average basis shall not exceed 91 MMBtu/hr.

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SPECIFIC CONDITIONS:

3. The maximum allowable emissions shall not exceed:

Unit	NOx		CO		PM/PM ₁₀		SO ₂		VOC	
	lbs/hr	TPY	lbs/hr	TPY	lbs/hr	TPY	lbs/hr	TPY	lbs/hr	TPY
GT	62.6	274.3	9.1	39.8	1.5	6.6	0.24	1.07	3.6	15.9
HRS	10.4	39.9	14.56	55.8	0.25	0.95	0.06	0.23	4.16	15.9

Note: HRS lbs/hr emissions are based on 104 MMBtu/hr heat input, and the TPY emissions are based on 91 MMBtu/hr avg. heat input.

4. Visible emissions (VE) shall not exceed 10% opacity.

5. Initial (I) and annual (A) compliance tests shall be conducted in accordance with the 1988 version of 40 CFR 60 Appendix A using the following test methods:

- a) EPA Method 5 for PM (I)
- b) EPA Method 9 for VE (I,A)
- c) EPA Method 10 for CO (I)
- d) EPA Method 7/20 for NOx* (I,A)
- e) EPA Method 6/20, or fuel analysis (ASTM) for SO₂ (I,A)
- f) EPA Method 25 for VOC (I)

*NOx emissions from the HRS shall be determined independently to verify compliance with 40 CFR 60 Subpart Db.

Other DER approved compliance test methods may be used only after Departmental approval.

6. A minimum of 15 days prior notification of the compliance tests shall be given to DER's Southwest District office. Compliance test results shall be submitted to the district office within 30 days of test completion.

7. The permittee shall comply with all the applicable requirements of F.A.C. Rules 17-2 and 17-4, and 40 CFR 60 Subpart Db.

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

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SPECIFIC CONDITIONS:

9. An application for an operation permit must be submitted to the Southwest District office at least 90 days prior to the expiration date of this construction permit or within 45 days after completion of compliance testing, whichever occurs first. 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. 17-4.220).

10. Any change in the method of operation, fuels, equipment or operating hours shall be submitted to DER's Southwest District office for approval.

11. Boiler Nos. 2,3,4,5,9 and 10 shall be shut down and dismantled. The boilers will not be allowed to operate beyond the date on which operation permits are issued to the GT/HRSG unit and the auxiliary boiler.

12. The sale of electrical output generated by the GT/HRSG unit shall not exceed one third of the total annual output based on a twelve month rolling average.

Issued this _____ day
of _____, 1989

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

Dale Twachtman, Secretary

Best Available Control Technology (BACT) Determination
Tropicana Products, Inc.
Manatee County

The applicant proposes to install a cogeneration plant at their citrus processing facility located in Bradenton, Florida. The cogeneration plant will consist of a 45.4 MW gas turbine, a heat recovery steam generator (HRSG) equipped with a 104 MM Btu/hr duct burner, and a 157.4 MM Btu/hr auxiliary boiler.

Both the gas turbine and HRSG duct burners will be fired with natural gas only. The auxiliary boiler will be fired with natural gas except during its curtailment in which case distillate oil will be used. The applicant has indicated the annual tonnage of regulated air pollutants emitted from the cogeneration facility based on 100 percent capacity and type of fuel firing to be as follows:

Maximum Potential Emissions
(tons/year)

Pollutant	Gas Turbine	HRSG	Auxiliary Boiler	
			Natural Gas	Oil
NO _x	274.3	39.9	80.3	34.0
SO ₂	1.1	0.2	0.3	34.3
PM	6.6	0.9	1.4	7.0
PM ₁₀	6.6	0.9	1.4	4.2
CO	35.8	55.8	86.9	14.6
VOC	15.9	15.9	8.3	1.4

The maximum emissions that could be emitted from the facility along with emission credits obtained through equipment shutdowns are compared to the PSD significant emission rates as follows:

Sources	Annual Emissions (TPY)					
	NO _x	PM	PM ₁₀	SO ₂	CO	VOC
Proposed:						
Gas Turbine	274.3	6.6	6.6	1.1	35.8	15.9
HRSG	39.9	0.9	0.9	0.2	55.8	15.9
Aux. Boiler	80.3	7.0	4.2	34.3	86.9	8.3
Subtotal	394.5	14.5	11.7	35.6	178.5	40.1

Shutdown:						
Existing Boilers*	33.6	1.2	1.2	0.1	8.4	1.4

Net Increase:	360.9	13.3	10.5	35.5	170.1	38.7

Significant Emission Rate:	40	25	15	40	100	40

* Boilers #2 - #5, #9 and #10 will be shutdown.

Florida Administrative Code Rule 17-2.500(2)(f)(3) requires a BACT review for all regulated pollutants emitted in an amount equal to or greater than the significant emission rates listed in the previous table.

BACT Determination Requested by the Applicant

The BACT determinations requested by the applicant on a pollutant by pollutant basis are given below:

Pollutant	Gas	HRSG	Auxiliary Boiler	
	Turbine		Natural Gas	Oil
NO _x	42 ppm*	0.1 lb/MMBtu	0.1 lb/MMBtu	0.2 lb/MMBtu
CO	10 ppm*	0.14 lb/MMBtu	150 ppm ⁺	150 ppm ⁺

* ppm corrected to 15% oxygen, day basis

+ ppm actual basis

Date of Receipt of a BACT Application

January 11, 1989

Review of Group Members:

This determination was based upon comments received from the applicant, EPA Region IV, and the Stationary Source Control Section.

BACT Determination Procedure:

In accordance with Florida Administrative Code Chapter 17-2, Air Pollution, this BACT determination is based on the maximum degree of reduction of each pollutant emitted which the Department (DER), on a case-by-case basis taking into account energy, environmental and economic impacts, and other costs, determines is achievable through application of production processes and available methods, systems, and techniques. In addition, the regulations state that in making the BACT determination the Department shall give consideration to:

- (a) Any Environmental Protection Agency determination of Best Available Control Technology pursuant to Section 169, and any emission limitation contained in 40 CFR Part 60 (Standards of Performance for New Stationary Sources) or 40 CFR Part 61 (National Emission Standards for Hazardous Air Pollutants).
- (b) All scientific, engineering, and technical material and other information available to the Department.
- (c) The emission limiting standards or BACT determinations of any other state.
- (d) The social and economic impact of the application of such technology.

The EPA currently stresses that BACT should be determined using the "top-down" approach. The first step in this approach is to determine for the emission source in question the most stringent control available for a similar or identical source or source category. If it is shown that this level of control is technically or economically infeasible for the source in question, then the next most stringent level of control is determined and similarly evaluated. This process continues until the BACT level under consideration cannot be eliminated by any substantial or unique technical, environmental, or economic objections.

BACT Determined by DER

Emission Limits

Pollutant	Gas	HRSG	Auxiliary Boiler	
	Turbine		Natural Gas	Oil
NO _x	42 ppm*	0.1 lb/MMBtu	0.1 lb/MMBtu	0.2 lb/MMBtu
CO	10 ppm*	0.14 lb/MMBtu	150 ppm+	150 ppm+

* ppm corrected to 15% oxygen, dry basis
 + ppm actual basis

BACT Determination Rationale

The Department has determined that the application as submitted represents BACT for this facility. In accordance with the "top down" BACT approach, an economic analysis has indicated that the control measures which are available to provide the highest emissions reductions are prohibitively expensive and thereby are not justified as BACT. These control options are investigated for each source on a pollutant-by-pollutant basis as follows.

The applicant has stated that BACT for nitrogen oxides will be met by using steam injection necessary to limit emissions to 42 ppmvd at 15 percent oxygen for the gas turbine. For the HRSG and auxiliary boiler the applicant has proposed a nitrogen oxides emission level of 0.1 lb/MMBtu as representing BACT for natural gas firing. In the case of oil firing, BACT for the auxiliary boiler is proposed as 0.2 lb/MMBtu. The control technology for the auxiliary boiler will be flue gas recirculation.

It should be noted that the nitrogen oxides emission reductions achieved by steam injection for this facility are an inherent part of the turbine design. The turbine proposed for use by Tropicana is a steam injected gas turbine. In this design, the turbines combustion gases are passed through the HRSG to heat pressurized water to superheated steam. Some of this steam is then injected into the combustor region of the gas turbine, where it is mixed with the combustor air and heated up to the turbine inlet temperature. This design is beneficial in that more power can be extracted from the turbine and nitrogen oxides control is achieved as a supplemental benefit.

A review of the EPA's BACT/LAER Clearinghouse - A Compilation of Control Technology Determinations (1985 edition) and it's May 1986, 1987, and 1988 supplements indicates that the lowest NO_x emission limit established to date for a combustion turbine is 4.5 ppmvd at 15 percent oxygen. This level of control was accomplished through the use of water injection and a selective catalytic reduction (SCR) system.

Selective catalytic reduction is a post-combustion method for control of NO_x emissions. The SCR process combines vaporized ammonia with NO_x in the presence of a catalyst to form nitrogen and water. The vaporized ammonia is injected into the exhaust gases prior to passage through the catalyst bed. The SCR process can achieve up to 90 percent reduction of NO_x with a new catalyst. As the catalyst ages, the maximum NO_x reduction will decrease to approximately 86 percent.

In order to justify the cost effectiveness of any air pollution control, the EPA has developed costing guidelines to obtain the highest reduction of emissions per dollar invested. Achievement of maximum emission reductions for capital invested is a major consideration when New Source Performance Standards (NSPS) are developed by the EPA. For NO_x emissions, EPA has determined that a cost of up to \$1,000 per ton of emissions controlled (\$0.50/lb) is reasonable for NSPS. The cost guideline can be used as a screening technique for justifying BACT since federal regulations require that BACT determinations be at least as stringent as NSPS.

The costs associated with using SCR to control nitrogen oxides emissions from the steam injected gas turbine/HRSG and the auxiliary boiler are shown below.

Cost Components and Effectiveness for SCR on the
GT/HRSG and Auxiliary Boiler

	GT/HRSG	Auxiliary Boiler
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Cost Component		
Capital Cost	\$7,130,000	\$3,000,000
Annualized Capital*	924,761	389,100
Operation & Maintenance	213,900	90,000
NH ₃	28,660	18,210
Catalyst	143,300	50,550
Total Annualized Cost	\$1,310,621	\$547,860
NO _x Removal Efficiency (%)	90	90
Maximum NO _x Emissions (tons/yr)	314.2	149.2
Maximum NO _x Removed (tons/yr)	282.8	134.3
Cost Effectiveness (\$/ton NO _x)	\$4,634	\$4,079
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* Based on an interest rate of 11.5% (current prime rate) and an equipment life of 20 years.

A review of the previous cost analysis indicates that the use of SCR for both the gas turbine/HRSG and the auxiliary boiler is well above the guideline and should not be considered as representing BACT for the facility.

The next level of nitrogen oxides control for the gas turbine/HRSG and the auxiliary boiler is achieved by selective non-catalytic reduction (SNCR). SNCR is a process by which either ammonia or urea is injected into the gas stream at a location where temperatures are in the range of 1,600 °F to 2,200 °F. Within this temperature range, ammonia or urea will selectively react with nitrogen oxides to form nitrogen and water or nitrogen, carbon dioxide, and water, respectively. NO_x emissions reductions between 30 to 70 percent can be achieved. The efficiency is dependent upon and limited by the flue gas temperature, residence time of the gases at the

critical temperature range, the degree of turbulence and mixing of the gas stream with the ammonia/urea, the ratio of ammonia or urea to NO_x , and the initial NO_x concentration.

The costs associated with using SNCR to control nitrogen oxides emissions from the steam injected gas turbine/HRSG and the auxiliary boiler are shown below.

Cost Components and Effectiveness for SNCR
on the GT/HRSG and Auxiliary Boiler

	GT/HRSG	Auxiliary Boiler
<hr/>		
Cost Component		
Capital Cost	\$964,000	\$384,000
Annualized Capital*	125,030	49,805
Maintenance	29,000	12,000
NH ₃	60,000	13,000
Steam	68,000	15,000
Electricity	6,000	1,000
Total Annualized Cost	\$288,030	90,805
NO _x Emissions before Control (tons/yr)	314.2	57.6
NO _x Removal Efficiency (%)	50	50
NO _x Removed (tons/yr)	157.1	28.8
Cost Effectiveness (\$/ton NO _x)	\$1,833	\$3,153
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* Based on an interest rate of 11.5% (current prime rate) and an equipment life of 20 years.

Although the cost of using SNCR to control nitrogen oxide emissions from the gas turbine/HRSG and the auxiliary boiler is much less on a cost per ton basis when compared to using SCR, the cost is again well above the guideline of \$1,000/ton and is judged to be economically prohibitive as BACT.

In addition to the high cost per ton, it should be noted that the use of SNCR has not been well demonstrated on gas fired turbines and boilers. Although the use of SNCR has been increasing, it has typically been used on coal and refuse fired applications.

The carbon monoxide emission limit proposed as BACT is 10 ppm (at 15% O₂, dry conditions) 0.14 lb/MMBtu and 150 ppm (actual conditions) for the gas turbine, HRSG, and the auxiliary boiler, respectively.

For the gas turbine 10 ppm at 15% O₂, dry conditions is the lowest limit presently being applied to most gas turbines in California and can be achieved through design and operating practices. For the HRSG, a limit of 0.14 lb/MMBtu is consistent with the CO emissions that can be achieved under the amount of steam that will be injected into the gas turbine. The limit of 150 ppm at actual conditions is the level of CO emissions that is guaranteed by the manufacture. This limit is appropriate for this source which will be operated only intermittently. Good combustion practices will be used to assure minimum emissions.

Based on the discussion above, the proposed BACT levels for carbon monoxide are judged to represent BACT for this facility. The good combustion practices will also ensure that the toxic organic compounds will be minimized.

The emissions of toxic air pollutants are estimated to be as follows:

Pollutant	Estimated Emissions (TPY)			
	Gas Turbine	HRSG	Auxiliary Boiler Natural Gas	Oil
Benzo(a) pyrene	-	-	-	0.0001
Cadmium	-	-	-	0.0189
Chromium	-	-	-	0.0076
Manganese	-	-	-	0.0002
Nickel	-	-	-	0.0764
Polycyclic Organic Matter (POM)	0.043	0.011	0.016	0.0079
Selenium	-	-	-	0.0027
Vanadium	-	-	-	0.0079

As shown above, the amount of toxic air pollutants emitted are minimal, with the total emissions of all eight toxics combined to be less than one ton per year.

Although the emissions of the toxic pollutants could be controlled by particulate control devices such as a baghouse or scrubber, the amount of emission reductions would not warrant the added expense. As this is the case, the Department does not believe that the BACT determination would be effected by the emissions of the toxic pollutants associated with the

cogeneration facility.

Dispersion modeling indicates that the maximum predicted impacts from the facility with the level of control proposed by the applicant will result in maximum concentrations which are 80 percent of the Ambient Air Quality Standard for nitrogen oxides and negligible for carbon monoxide, respectively. As this is the case, the impacts associated with the proposed cogeneration facility are not perceived to be a threat to air quality.

Conclusion

The Department has determined that the level of control proposed by the applicant for the cogeneration facility represents BACT in all cases. The "top down" BACT approach has indicated that the more efficient than proposed control measures are too costly to warrant as being BACT for this facility. The control level as proposed is as efficient as any previous controls required for similar equipment with the exception of units in California which were required to utilize selective catalytic reduction.

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 Blair Stone Road
Tallahassee, Florida 32399-2400

Recommended by:

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

Date 1989

Approved by:

Dale Twachtman, Secretary

Date 1989

FEDERAL EXPRESS

QUESTIONS? CALL 800-238-5355 TOLL FREE.

AIRBILL
NUMBER

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1 From (Your Name) Please Print Ken Kosky Company KBN ENG & APPLIED SCIENCES Street Address 5700 SW 34TH STREET STE 1262 City GAINESVILLE FL		Date 4-17-89 Your Phone Number (Very Important) (904) 375-8000 Department/Floor No	2 To (Recipient's Name) Please Print Bill Thomas Company Bureau of Air Quality Management, TDR Exact Street Address (Use of P.O. Boxes or P.O. Zip Codes will result in Extra Charge) 2600 Blairstone Road City Tallahassee, FL 32301	Recipient's Phone Number (Very Important) (904) 375-8000 Department/Floor No ZIP Street Address Zip Required 32301
3 YOUR BILLING REFERENCE INFORMATION (FIRST 24 CHARACTERS WILL APPEAR ON INVOICE.) 88069				
4 SERVICES CHECK ONLY ONE BOX 1 <input type="checkbox"/> PRIORITY 1 Overnight Delivery Using Your Packaging 2 <input type="checkbox"/> Courier Pak Overnight Envelope* 12"x 15" 3 <input type="checkbox"/> Overnight Box 12 1/2"x 17 1/2"x 3" A <input type="checkbox"/> 4 <input type="checkbox"/> Overnight Tube 38"x 6"x 6" B <input type="checkbox"/> 5 <input type="checkbox"/> STANDARD AIR Delivery not later than second business day 6 <input checked="" type="checkbox"/> OVERNIGHT LETTER* (Our Packaging 9"x 12") 7 <input type="checkbox"/> DELIVER WEEKDAY 8 <input type="checkbox"/> DELIVER SATURDAY (Extra charge) 9 <input type="checkbox"/> DANGEROUS GOODS (P-1 and Standard Air Packages only. Extra charge) 10 <input type="checkbox"/> CONSTANT SURVEILLANCE SERVICE (CSS) (Extra charge) (Do Not Complete Section 5) 11 <input type="checkbox"/> DAY ICE Lbs 12 <input type="checkbox"/> OTHER SPECIAL SERVICE 13 <input type="checkbox"/> SATURDAY PICK-UP (Extra charge) 14 <input type="checkbox"/> DELIVER WEEKDAY 15 <input type="checkbox"/> DELIVER SATURDAY (Extra charge) 16 <input type="checkbox"/> DANGEROUS GOODS (P-1 and Standard Air Packages only. Extra charge) 17 <input type="checkbox"/> CONSTANT SURVEILLANCE SERVICE (CSS) (Extra charge) (Do Not Complete Section 5) 18 <input type="checkbox"/> DAY ICE Lbs 19 <input type="checkbox"/> OTHER SPECIAL SERVICE 20 <input type="checkbox"/> SATURDAY PICK-UP (Extra charge)				
5 DELIVERY AND SPECIAL HANDLING CHECK SERVICES REQUIRED 1 <input type="checkbox"/> HOLD FOR PICK-UP (P-1 in Section 11 at night) 2 <input type="checkbox"/> DELIVER WEEKDAY 3 <input type="checkbox"/> DELIVER SATURDAY (Extra charge) 4 <input type="checkbox"/> DANGEROUS GOODS (P-1 and Standard Air Packages only. Extra charge) 5 <input type="checkbox"/> CONSTANT SURVEILLANCE SERVICE (CSS) (Extra charge) (Do Not Complete Section 5) 6 <input type="checkbox"/> DAY ICE Lbs 7 <input type="checkbox"/> OTHER SPECIAL SERVICE 8 <input type="checkbox"/> SATURDAY PICK-UP (Extra charge)				
6 HOLD FOR PICK-UP AT THIS FEDERAL EXPRESS LOCATION: Street Address (See Service Guide or Call 800-238-5355) City State ZIP * Zip Code of Street Address Required Emp No. Date <input type="checkbox"/> Cash Received <input type="checkbox"/> Return Shipment <input type="checkbox"/> Third Party <input type="checkbox"/> Chg. To Use <input type="checkbox"/> Chg. To Hold Street Address City State Zip Received By: X Date/Time Received FedEx Employee Number Date/Time For Federal Express Use				

RECIPIENT'S COPY

007



April 17, 1989
88069

Mr. Bill Thomas
Bureau of Air Quality Management
Florida Department of Environmental Regulation
2600 Blainstone Road
Tallahassee, Florida 32301

RECEIVED
APR 18 1989
DER-BAQM

Re: Tropicana Cogeneration Project
DER File Nos. AC 41-157745, AC 41-150485 and PSD-FL-136

Dear Bill:

This correspondence is being submitted on behalf of Tropicana Products, Inc. concerning one specific condition contained in proposed permit Number AC 41-150485 for the auxiliary boiler. It is respectfully requested that Specific Condition Number 14 be removed from the issued permit. This condition requires that the auxiliary boiler not be operated other than for service on maintenance while the gas turbine is operating normally.

Specific Condition Number 14 is unwarranted for the following reasons:

1. The information supplied to support the permit application and PSD analysis was based on both the gas turbine and auxiliary boiler operating at the same time. This was done so that both sources could operate simultaneously, if necessary. Therefore, the permit request was for independent permits for each source.
2. The condition allows for a range of interpretations.
3. The condition could increase Tropicana's reporting requirements for obtaining operating permits.

All other conditions have been reviewed and are acceptable.

KBN ENGINEERING AND APPLIED SCIENCES, INC.

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Mr. Bill Thomas
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April 17, 1989

If you have any questions, please call.

Sincerely,

A handwritten signature in cursive script that reads "Kennard F. Kosky".

Kennard F. Kosky, P.E.
Project Manager

KFK:mah

cc: Mr. Griscom Bettel, III Tropicana
Mr. Gordon Hartman, Tropicana
Mr. Scobee Woolwine, P.E., Tropicana
Mr. William Sedlock, P.E., Monsanto

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