

Golder Associates Inc.

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Gainesville, FL 32653-1500
Telephone (352) 336-5600
Fax (352) 336-6603



RECEIVED 0237563
OCT 14 2002

October 11, 2002

Florida Department of Environmental Protection
Division of Air Resource Management
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

BUREAU OF AIR REGULATION

Attention: Mr. Edward J. Svec, Title V Section

RE: TROPICANA PRODUCTS, INC. BRADENTON CITRUS PROCESSING FACILITY
DRAFT AIR CONSTRUCTION PERMIT FOR INSTALLATION OF LM 6000
PERMIT NO. 0810007-011-AC

Dear Ed:

This correspondence is being submitted on behalf of Tropicana Products, Inc. to provide comments on the draft air construction permit for the replacement of the existing General Electric (GE) LM5000 gas turbine with a GE LM6000 gas turbine. The comments are primarily for correction and clarification and do not change any of the emission bases for the new turbine.

Description of the Project (Page 6 of 9, top of the page): The LM6000 uses wet injection for NO_x control. Therefore, in the first line the phrase "with a low NO_x burner" should be changed to "with NO_x control". The term low NO_x burner primarily applies to single burner type systems (e.g., duct burners). The maximum heat input should be 456 MMBtu/hr, which corresponds to the 49.9 MW for the LM6000 gas turbine. This is the basis for the GE guarantee. The heat input of 434 MMBtu/hr reflected the maximum heat for the LM5000 in the original air construction/PSD approval for the cogeneration project. Please refer to Table 1 in Part II Supporting Information to the permit application. It is requested that the description be stated as follows: "...a maximum design heat input of 456 MMBtu per hour (HHV) at 49.9 MW, and....".

Condition 1. Capacity (page 6 of 9) Paragraph a.: As described above the maximum heat input for the LM6000 is 456 MMBtu/hr at 49.9 MW. It is requested that the condition be changed as follows: "...shall not exceed 456 MMBtu per hour (HHV) at 49.9 MW." In addition, Tropicana requests that an additional condition be added to this paragraph to reflect a federally enforceable limit on generation of 49.9 MW. Similar conditions have been added to steam electric projects involving limitation of generations to less than 75 MW. The proposed condition is: "Electrical power from the gas turbine shall be limited to 49.9 MW on an hourly basis."

Condition 2. Fuel Sulfur Content (Page 6 of 9): There appears to be a typographical error in the unit for sulfur content of gas. The sulfur content is one "grain" per 100 cubic feet.

Condition 6. Emissions from the Heat Recovery Steam Generator (HRSG) (Page 7 of 9): The PM/PM₁₀ emissions from the HRSG were changed by Permit No. 0810007-009-AC to 1.04 pounds per hour and 4 tons per year. Please refer to Condition 2 of Section III of that permit.

Condition 8f. Test Methods for VOCs (Page 8 of 9): It is requested that EPA Method 18 be added. More recent gas turbine permits have included both methods. The requested condition would be: "EPA Methods 18 or 25A for VOC".

Condition 10. Testing and Heat Input (Page 8 of 9): The heat input noted as "434 MMBtu per hour" on line 4, should be changed to 456 MMBtu per hour at 49.9 MW as noted above.

Your consideration of these comments is appreciated. Please call me or Doug Foster of Tropicana (941/742-2748) if you have any questions.

Sincerely,

GOLDER ASSOCIATES INC.

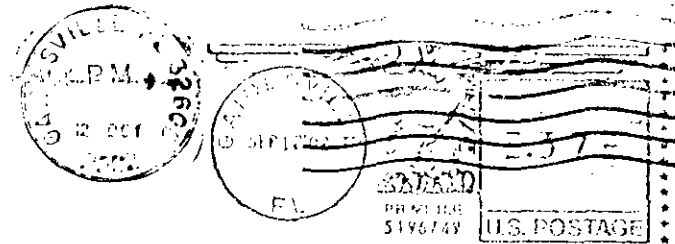


Kennard F. Kosky, P.E.
Principal

KFK/jkw

cc: Mr. Michael Haycock, Tropicana Products, Inc.
Mr. Douglas Foster, Tropicana Products, Inc.

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

Attn: Mr. Edward J. Svec, Title V Section

32399+2400 



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CERTIFIED MAIL-RETURN RECEIPT
October 3, 2002

BUREAU OF AIR REGULATION

Mr. Edward J. Svec, P.E.
Bureau of Air Regulation
Florida Dept. of Environment Protection
2600 Blair Stone Road
Mail Station 5505
Tallahassee, FL 32399-2400

**RE: DEP FILE NO. 0810007-011-AC
NEW GAS TURBINE**

Dear Mr. Svec:

Enclosed please find an affidavit of publication of the Notice of Intent to Issue Air Construction Permit to Tropicana Products, Inc., to allow installation of a new gas turbine at its Bradenton facility.

If you need anything further regarding this matter, please let me know.

Sincerely,

A handwritten signature in cursive script that reads "Douglas E. Foster" followed by a stylized monogram.

Douglas E. Foster
Director, Corporate Environmental & Safety

jlb

Enclosure

BRADENTON HERALD

www.bradenton.com
P.O. Box 921
Bradenton, FL 34206-0921
102 Manatee Avenue West
Bradenton, FL 34205-8894
941/748-0411 ext. 7065

Bradenton Herald
Published Daily
Bradenton, Manatee, Florida

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OCT 07 2002

BUREAU OF AIR REGULATION

PUBLIC NOTICE OF
INTENT TO ISSUE AIR
CONSTRUCTION PER-
MIT

STATE OF FLORIDA
DEPARTMENT OF
ENVIRONMENTAL
PROTECTION

DEP File No. 0810007-
011-AC

Tropicana Products,
Inc.

Manatee County

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit to Tropicana Products, Inc. for its existing citrus juice processing facility located at 1001 13th Avenue, Bradenton, Manatee County. The applicant's mailing address is: PO Box 338, Bradenton, FL 34206. The project is the installation of a new General Electric Model LM 6000 gas turbine to replace an existing General Electric Model LM 5000 gas turbine (Emissions Unit I.D. No. 016). The existing Heat Recovery Steam Generator (HRSG) will be utilized with the new turbine.

Total emissions of pollutants from the installation of the new gas turbine authorized by this permit will not exceed the following approximate annual emission rates in tons per year: PM/PM10, 8.4; CO, 91.0; NOx, 35.6; SO2, 4.8; and VOC, 1.7.

The Department will issue the final permit with the attached conditions unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The Department will accept written comments concerning the proposed permit issuance action for a period of fourteen (14) days from the date of publication of this Public Notice of Intent to Issue Air construction Permit. Written comments should be provided to the Department's Bureau of Air Regulation at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, FL 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in the proposed agency action, the Department shall revise the proposed permit and

require, if applicable, another Public Notice.

The Department will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to Sections 1201569 and 120157, Florida Statutes (F.S.), before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below.

Mediation is not available in this proceeding.

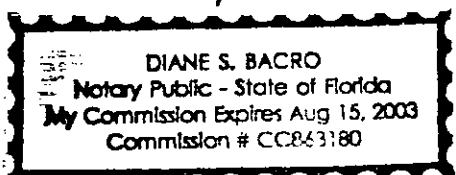
STATE OF FLORIDA
COUNTY OF MANATEE;

Before the undersigned authority personally appeared Sandy Riley, who on oath says that she is a Legal Advertising Representative of the Bradenton Herald, a daily newspaper published at Bradenton in Manatee County, Florida; that the attached copy of the advertisement, being a Legal Advertisement in the matter of **PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT** in the Court, was published in said newspaper in the issues of, **9/27,'02**

Affiant further says that the said publication is a newspaper published at Bradenton, in said Manatee County, Florida, and that the said newspaper has heretofore been continuously published in said Manatee County, Florida, each day and has been entered as second-class mail matter at the post office in Bradenton, in said Manatee County, Florida for a period of 1 year next preceding the first publication of the attached copy of advertisement; and affiant further says that she 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 the said newspaper.

Sandy Riley
(Signature of Affiant)

Sworn to and subscribed before me this
30th Day of September, 2002



Diane S. Bacro
SEAL & Notary Public

Personally Known ☒ OR Produced Identification _____
Type of Identification Produced _____

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under Sections 120.569 and 120.57 (F.S.). The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the permitting authority for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. The failure of any person to file a petition within the applicable time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57 F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, of the Florida Administrative Code (F.A.C.)

A petition that disputes the material facts on which the permitting authority's action is based must contain the following information:

- (a) The name & address of each agency affected and each agency's file or identification number, if known;
- (b) The name, address and telephone number of the petitioner, the name, address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination;
- (c) A statement of how and when each petitioner received notice of the agency's action or proposed action;
- (d) A statement of all disputed issues of material fact. If there are none, the petitioner must so indicate;
- (e) A concise statement of the ultimate facts alleged, as well as the rules and statutes which entitle petitioner to relief;
- (f) A statement of specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and
- (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the permitting authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the permitting authority's final action may be different from the position taken by it in this notice of intent. Persons whose substantial interests will be affected by any such final decision of the permitting authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

A complete project file 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:

Florida Department of Environmental Protection
Bureau of Air Regulations
Suite 4
111 S. Magnolia Dr.
Tallahassee, FL 32301
Ph. 850/488-0114
Fax: 850/922-6979

Dept. of Environmental Protection
Southwest District
3804 Coconut Palm Dr.
Tampa, FL 33619-8218
Ph. 813/744-6100

The complete project file includes the application, technical evaluation, draft permit, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Administrator, Title V Section, or the Department's reviewing engineer for this project, Edward J.

Svec, at the Bureau of Air Regulation in Tallahassee, Florida, or call 850/488-0114, for additional information. Written comments directed to the Department's reviewing engineer should be sent to the following mailing address: Dept. of Environmental Protection, Bureau of Air Regulation, Mail Station #5505, Tallahassee, Florida 32399-2400.
9/27/02