STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
NOTICE OF FINAL PERMIT

In the Matter of an
Application for Permit by:

Donald Antenore, Vice President, Mfg.
Tropicana Products, Inc.
PO Box 338
Bradenton, Florida 34206

DEP File No. 0810007-008-AC
Standby Process Steam Boiler
Manatee County

Enclosed is final permit number 0810007-008-AC for Tropicana Products, Inc.'s existing citrus juice processing facility located at 1001 13th Avenue, Bradenton, Manatee County. The permit is to allow the installation of a portable standby process steam boiler with a physical capacity of 99 mmBtu/hour or less, that fires natural gas and low sulfur distillate fuel oil (0.05% sulfur by weight). This permitting action will allow the applicant the flexibility to install the portable boiler or remove it in accordance with the applicant's needs. The applicant is not limited to the use of any particular make or model boiler, and the length of time the boiler may be located at the facility is not limited. Further, the applicant may install and remove a boiler, and then install it or another boiler again, as needed. The permit term is five years, to allow for the installation and removal of the boiler as needed over that period of time. This permit is issued pursuant to Chapter 403, Florida Statutes.

Any party to this order has the right to seek judicial review of it under section 120.68 of the Florida Statutes, by filing a notice of appeal under rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel, Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000, 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 must be filed within thirty days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida.

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

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Notice of Final Permit (including the final permit) was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 2/14/01 to the person(s) listed:

Mr. Donald Antenore, Tropicana Products, Inc. *
Mr. Ken Kosky, P.E., Golder
Mr. Bill Thomas, P.E., DEP SWD
Mr. Marion Forthoffer, Manatee Co. EMD

Clerk Stamp

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

Charlotte J. Hayes 2/14/01
(Clerk) (Date)

1 APPLICANT NAME AND ADDRESS

Tropicana Products, Inc.
PO Box 338
Bradenton, Florida 34206

Authorized Representative: Donald Antenore, Vice President, Mfg.

2 FACILITY DESCRIPTION, PROJECT DETAILS AND RULE APPLICABILITY

The facility is an existing citrus juice processing facility. The project is the installation of a portable standby process steam boiler with a physical capacity of 99 mmBtu/hour or less, that fires natural gas and very low sulfur distillate fuel oil (0.05% sulfur by weight). The applicant intends to use this boiler as a supplemental source of steam to meet steam needs. Currently steam is provided primarily by the facility's cogeneration unit (EU 016) and its auxiliary boiler (EU 015). This permitting action will allow the applicant the flexibility to install the portable boiler or remove it in accordance with the applicant's needs. The applicant is not limited to the use of any particular make or model boiler, and the length of time the boiler may be located at the facility is not limited. Further, the applicant may install and remove a boiler, and then install it or another boiler again, as needed. The permit term is five years, to allow for the installation and removal of the boiler as needed over that period of time. The applicant did not seek any relaxation in currently enforceable conditions in its existing emissions units.

Emissions units addressed by this permit are the standby process steam boiler, new emissions unit 025.

The emissions increases associated with this project were estimated as follows in tons per year. No offsetting emissions from the cogeneration unit or the auxiliary boiler were assumed in this estimate.

Pollutant	Net Increase [1]	PSD Significance	Subject to PSD?
PM/ PM_{10}	1.2	25/15	No
SO_2	2.7	40	No
NOx	30.6	40	No
CO	21.6	100	No
VOC	1.4	40	No

[1] Potential emissions (shown as net increase) were estimated by the Department from allowable natural gas and distillate fuel oil usage and AP-42 emission factors (tables 1.3-1 and 1.3-3 for fuel oil, tables 1.4-1 and 1.4-2 for natural gas), assuming a higher heat content of 1050 Btu/scf of natural gas and 140 million Btu/1000 gallons of distillate fuel oil, given a design heat input capacity of 99 mmBtu/hour, and the fuel use limits of the permit.

The proposed project is subject to preconstruction review requirements under the provisions of Chapter 403, F.S., and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297, F.A.C. The existing facility is located in an area designated, in accordance with Rule 62-204.340, F.A.C., as attainment or unclassifiable for the criteria pollutants ozone, PM_{10}, carbon monoxide, SO_2, nitrogen dioxide and lead. This facility is classified as a Major or Title V Source of air pollution because emissions of at least one regulated air pollutant exceeds 100 tons per year (TPY). The Department has previously found that citrus juice processing facilities such as this facility have potential emissions of VOC exceed 250 TPY.

This facility is not within an industry included in the list of the 28 Major Facility Categories per Table 62-212.400-1 of Chapter 62-212, F.A.C. Because emissions are greater than 250 TPY for at least one criteria pollutant (VOC), the facility is also an existing Major Facility with respect to Rule 62-212.400, Prevention of Significant Deterioration (PSD). The net increase in emissions of PM/PM_{10}, NOx, SO_2, CO and VOC do not exceed the PSD significance levels of Table 212.400-2, F.A.C. Therefore the project is not subject to PSD requirements of Rule 62-212.400,F.A.C., for these pollutants.

The portable standby process steam boiler is subject to regulation under the New Source Performance Standards of 40 CFR 60, Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units. This emissions unit is also subject to a determination of Best Available Control Technology (BACT) pursuant to Rule 62-296.406, F.A.C. The applicant requested that BACT be determined to be the use of natural gas and 0.5% sulfur distillate fuel oil. BACT for small boilers is typically the use of natural gas and 0.05% sulfur distillate fuel oil, so the applicant's request is not consistent with the Department's previous BACT determinations. The Department's determination for this project is that BACT shall be the use of natural gas as the primary fuel, with very low sulfur (0.05% by weight) fuel oil allowed as a backup fuel. Fuel consumption will be further limited, to limit natural gas consumption to the equivalent of approximately 5000 full load hours, and distillate fuel oil consumption to the equivalent of approximately 1000 full load hours (assuming a design heat input of 99 mmBtu/hour). (Because fuel consumption is limited by the permit, the hours of operation are not limited.)

The rationale for the Department's BACT determination is that sulfur in fuel is a primary air pollution concern since most of the fuel sulfur becomes sulfur dioxide, and particulate matter emissions from fuel burning are related to the sulfur content. Reducing the allowable sulfur content of the fuels burned will reduce the emissions of sulfur dioxide and particulate matter. Natural gas has the lowest sulfur content of the typically available fuels. Burning of natural gas results in relatively lower emissions of other criteria pollutants as compared with firing fuel oil, with the exception of nitrogen oxides which are higher. Thus, for the majority of pollutants, including particulate matter and sulfur dioxide, the use of natural gas is the best alternative. Fuel oil is permitted as a backup fuel, although its use is limited because of its higher sulfur content.

The applicant stated that this facility is a major source of hazardous air pollutants (HAPs). This project is not subject to a case-by-case MACT determination, per Rule 62-204.800(10)(d)2, F.A.C., because it does not result in the construction or reconstruction of a major source of HAP emissions. This project is not subject to any requirements under the National Emissions Standards for Hazardous Air Pollutants, 40 CFR 61 or 63.

3 SOURCE IMPACT ANALYSIS

An impact analysis was required for this project because it is not subject to the requirements of PSD.

4 EXCESS EMISSIONS

Excess emissions for this emissions unit are specified in Section II of the permit. This permitting action does not change any authorization for excess emissions provided by other Department permits for other emissions units. The excess emissions provisions of state rule can not be used to vary any NSPS requirements applicable to this emissions unit.

5 LIMITS AND COMPLIANCE REQUIREMENTS

The permit limits the sulfur content of the distillate fuel oil and limits the heat input to the emissions units from all permitted fuels. Specific emission limits were not imposed because the potential emissions are well below the PSD significance criteria. The fuel consumption limits, reference to the applicable NSPS requirements, and the compliance requirements are detailed in Section III of the permit.

6 PRELIMINARY DETERMINATION

Based on the foregoing technical evaluation of the application and additional information submitted by the applicant and other available information, the Department has made a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations. The

Department's preliminary determination is to issue the draft permit to allow the installation of a portable standby process steam boiler, subject to the terms and conditions of the draft permit.

7 FINAL DETERMINATION

The Department distributed a public notice package, with the draft permit, on January 19, 2001. The Public Notice of Intent to Issue was published in the Bradenton Herald on January 25, 2001.

No comments were received by the Department from the public or the applicant.

The final action of the Department is to issue the permit with no changes.

DETAILS OF THIS ANALYSIS MAY BE OBTAINED BY CONTACTING:

Joseph Kahn, P.E.
Department of Environmental Protection
Bureau of Air Regulation
Mail Station #5505
2600 Blair Stone Road
Tallahassee, Florida 32399-2400
Telephone: 850/488-0114

Recommended by:

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

2/13/01
Date

Approved by:

Howard L. Rhodes, Director
Division of Air Resources Management

2/13/01
Date

Department of Environmental Protection

Jeb Bush
Governor

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

David B. Struhs
Secretary

PERMITTEE

Tropicana Products, Inc.
PO Box 338
Bradenton, Florida 34206

Permit No.	0810007-008-AC
Project	Standby Process Steam Boiler
SIC No.	2033, 2037, 2048
Expires:	February 8, 2006

Authorized Representative:

Donald Antenore, Vice President, Mfg.

PROJECT AND LOCATION

This permit authorizes Tropicana Products, Inc. to install a portable standby process steam boiler with a physical capacity of 99 mmBtu/hour or less, that fires natural gas and very low sulfur distillate fuel oil (0.05% sulfur by weight).

This facility is located at 1001 13th Avenue, Bradenton, Manatee County. The UTM coordinates are: Zone 17; 561.4 km E and 3056.5 km N.

STATEMENT OF BASIS

This construction permit is issued under the provisions of Chapter 403 of the Florida Statutes (F.S.), and the Florida Administrative Code (F.A.C.) Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297. The above named permittee is authorized to construct the emissions units in accordance with the conditions of this permit and as described in the application, approved drawings, plans, and other documents on file with the Department of Environmental Protection (Department).

APPENDICES

The attached appendix is a part of this permit:

Appendix GC General Permit Conditions

Howard L. Rhodes, Director
Division of Air Resources
Management

SECTION I. FACILITY INFORMATION

FACILITY AND PROJECT DESCRIPTION

The facility is an existing citrus juice processing facility. The project is the installation of a portable standby process steam boiler with a physical capacity of 99 mmBtu/hour or less, that fires natural gas and very low sulfur distillate fuel oil (0.05% sulfur by weight). This boiler will be emissions unit 025. The applicant intends to use this boiler as a supplemental source of steam to meet steam needs. Currently steam is provided primarily by the facility's cogeneration unit (EU 016) and its auxiliary boiler (EU 015). This permit allows the applicant the flexibility to install the portable boiler or remove it in accordance with the applicant's needs. The applicant is not limited to the use of any particular make or model boiler, and the length of time the boiler may be located at the facility is not limited. Further, the applicant may install and remove a boiler, and then install it or another boiler again, as needed. The permit term is five years, to allow for the installation and removal of the boiler as needed over that period of time.

The annual potential emissions associated with this project in tons per year are approximately: PM/PM_{10}, 1.2; NOx, 30.6; SO_2, 2.7; CO, 21.6; and VOC, 1.4. The facility information, project scope, emissions and rule applicability are described in detail in the Department's Technical Evaluation and Determination.

REVIEWING AND PROCESS SCHEDULE

January 10, 2001	Received permit application (no application fee required)
January 10, 2001	Application complete
January 19, 2001	Distributed Notice of Intent to Issue and supporting documents
January 25, 2001	Notice of Intent published in the Bradenton Herald

RELEVANT DOCUMENTS

The documents listed below are the basis of the permit. They are specifically related to this permitting action. These documents are on file with the Department.

- Permit application
- Department's Technical Evaluation and Determination
- Department's Intent to Issue

SECTION II. FACILITY-WIDE SPECIFIC CONDITIONS

The following specific conditions apply to all emissions units at this facility addressed by this permit.

ADMINISTRATIVE

1. Regulating Agencies: All documents related to applications for permits to construct, operate or modify an emissions unit should be submitted to the Bureau of Air Regulation (BAR), Florida Department of Environmental Protection at Mail Station #5505, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, phone number 850/488-0114. All documents related to reports, tests, minor modifications and notifications shall be submitted to the Department's Southwest District office at 3804 Coconut Palm Drive, Tampa, Florida 33619-8218, and phone number 813-744-6100.
2. General Conditions: The owner and operator is subject to and shall operate under the attached General Permit Conditions G.1 through G.15 listed in Appendix GC of this permit. General Permit Conditions are binding and enforceable pursuant to Chapter 403 of the Florida Statutes. [Rule 62-4.160, F.A.C.]
3. Terminology: The terms used in this permit have specific meanings as defined in the corresponding chapters of the Florida Administrative Code.
4. Applicable Regulations, Forms and Application Procedures: Unless otherwise indicated in this permit, the construction and operation of the subject emissions unit shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of Chapter 403, F.S. and Florida Administrative Code Chapters 62-4, 62-110, 62-204, 62-212, 62-213, 62-296, 62-297 and the Code of Federal Regulations Title 40, Part 60, adopted by reference in the Florida Administrative Code (F.A.C.) regulations. The permittee shall use the applicable forms listed in Rule 62-210.900, F.A.C. and follow the application procedures in Chapter 62-4, F.A.C. Issuance of this permit does not relieve the facility owner or operator from compliance with any applicable federal, state, or local permitting or regulations. [Rules 62-204.800, 62-210.300 and 62-210.900, F.A.C.]
5. New or Additional Conditions: Pursuant to Rule 62-4.080, F.A.C., for good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]
6. Expiration: This air construction permit shall expire on February 8, 2006. The permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the Department's Bureau of Air Regulation prior to 60 days before the expiration of the permit. [Rules 62-210.300(1), 62-4.070(4), 62-4.080, and 62-4.210, F.A.C]
7. Modifications: No emissions unit or facility subject to this permit shall be constructed or modified without obtaining an air construction permit from the Department. Such permit must be obtained prior to the beginning of construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]
8. Title V Operation Permit Required: This permit authorizes construction and/or installation of the permitted emissions unit and initial operation to determine compliance with Department rules. A revision to the Title V operation permit is required for regular operation of the permitted emissions

unit. The owner or operator shall apply for a Title V operation permit at least ninety days prior to expiration of this permit, but no later than 180 days after commencing operation. To apply for a Title V operation permit, the applicant shall submit the appropriate application form, compliance test results, and such additional information as the Department may by law require. The application shall be submitted to the Department's Southwest District office. [Rules 62-4.030, 62-4.050, 62-4.220, and Chapter 62-213, F.A.C.]

OPERATIONAL REQUIREMENTS

9. Plant Operation - Problems: If temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by hazard of fire, wind or by other cause, the permittee shall immediately notify the Department's Southwest District office. The notification shall include pertinent information as to the cause of the problem, and what steps are being taken to correct the problem and to prevent its recurrence, and where applicable, the owner's intent toward reconstruction of destroyed facilities. Such notification does not release the permittee from any liability for failure to comply with Department rules. [Rule 62-4.130, F.A.C.]

10. Circumvention: No person shall circumvent any air pollution control device or allow the emission of air pollutants without the applicable air pollution control device operating properly. [Rule 62-210.650, F.A.C.]

11. Excess Emissions: This permit does not change any authorization for excess emissions provided by other Department permits for other emissions units. The following excess emissions provisions of state rule apply to this emissions unit (emissions unit 025) as specified below. These provisions can not be used to vary any NSPS requirements applicable to this emissions unit.

    (a) Excess emissions resulting from start-up and shutdown are permitted for emissions unit 025 providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized, but in no case exceed two hours in any 24 hour period.

    (b) Excess emissions resulting from malfunction of this emissions unit shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized, but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration.

    (c) Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during start-up, shutdown, or malfunction shall be prohibited.

    [Rules 62-210.700(1), (4) and (5), F.A.C.]

COMPLIANCE MONITORING AND TESTING REQUIREMENTS

12. Determination of Process Variables: [Rule 62-297.310(5), F.A.C.]

    (a) Required Equipment. The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.

    (b) Accuracy of Equipment. Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.

REPORTING AND RECORD KEEPING REQUIREMENTS

13. Duration of Record Keeping: 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. The permittee shall hold 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) 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 five years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule. [Rules 62-4.160(14)(a)&(b) and 62-213.440(1)(b)2.b., F.A.C.]

14. Excess Emissions Report: In case of excess emissions resulting from malfunction, the owner or operator shall notify the Department's Southwest District office within one working day of: the nature, extent, and duration of the excess emissions; the cause of the excess emissions; and the actions taken to correct the problem. In addition, the Department may request a written summary report of the incident. A full written report on the malfunctions shall be submitted in a quarterly report if requested by the Department. [Rules 62-4.130 and 62-210.700(6), F.A.C.]

15. Annual Operating Report for Air Pollutant Emitting Facility: The Annual Operating Report for Air Pollutant Emitting Facility shall be completed each year and shall be submitted to the Department's Southwest District office and, if applicable, the appropriate local program by March 1 of the following year. [Rule 62-210.370(3), F.A.C.]

The following specific conditions apply to the following emissions units after construction.

EMISSIONS UNIT NO.	EMISSIONS UNIT DESCRIPTION
025	Standby process steam boiler

[Note: This emissions unit is a portable standby process steam boiler that is installed to serve as a supplemental source of steam to meet steam needs. This boiler is limited to one of a physical capacity of 99 mmBtu/hour or less, that fires natural gas and very low sulfur distillate fuel oil (0.05% sulfur by weight). This permit allows the applicant the flexibility to install the portable boiler or remove it in accordance with the applicant's needs. The applicant is not limited to the use of any particular make or model boiler, and the length of time the boiler may be located at the facility is not limited. Further, the applicant may install and remove a boiler, and then install it or another boiler again, as needed. This emissions unit is subject to the requirements of the state rules as indicated in this permit. This emissions unit is subject to a determination of Best Available Control Technology pursuant to Rule 62-296.406, F.A.C. The fuel authorized by this permit is consistent with that BACT determination. This emissions unit is also subject to regulation under the New Source Performance Standards of 40 CFR 60, Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units.]

STATE RULE REQUIREMENTS

OPERATIONAL REQUIREMENTS

1. Hours of Operation: This emissions unit may operate up to 8,760 hours/year. [Rules 62-4.070(3) and 62-210.200, F.A.C., and limitation on potential to emit]

2. Design Heat Input Capacity Limited: The design heat input capacity of this emissions unit shall be limited to a maximum of 99 mmBtu per hour, based on the physical design and characteristics of the steam generation unit. [Rules 62-4.070(3) and 62-210.200, F.A.C., and limitation on potential to emit]

3. Fuel Consumption Limited: This emission unit shall primarily be fired with natural gas. Distillate fuel oil with a maximum sulfur content of 0.05 percent, by weight, may be used as a backup fuel. Natural gas consumption by this emissions unit shall not exceed 471 million standard cubic feet in any consecutive 12-month period. Distillate fuel oil consumption by this emissions unit shall not exceed 707 thousand gallons in any consecutive 12-month period. [Rules 62-4.070(3), 62-210.200 and 62-296.406, F.A.C., BACT for small boilers, and limitation on potential to emit]

   [Note: This condition limits natural gas usage to the equivalent of 5000 hours per year, and distillate fuel oil consumption to the equivalent of 1000 hours per year, assuming a heat input of 99 mmBtu/hour and an average HHV of 1050 mmBtu/million scf of natural gas and 140 mmBtu/1000 gallons of fuel oil.]

4. Visible Emissions Limited: Visible emissions from this emissions unit shall not exceed 20 percent opacity except for one six-minute period per hour during which opacity shall not exceed 27 percent. [Rule 62-296.406(1), F.A.C.]

COMPLIANCE MONITORING AND TESTING REQUIREMENTS

5. Fuel Sulfur Content Tests: The owner or operator shall determine the sulfur content of each delivery of distillate fuel oil received for these emissions units using ASTM D4057-88, Standard Practice for Manual Sampling of Petroleum and Petroleum Products, and one of the following test methods for sulfur in petroleum products: ASTM D129-91, ASTM D1552-90, ASTM D2622-94, or ASTM D4294-90. A more recent version of these methods may be used. The owner or operator may comply with this requirement by receiving records from the fuel supplier that indicate the sulfur content of the distillate fuel oil delivered complies with the sulfur limit of specific condition 3 of this section. [Rules 62-4.070(3) and 62-297.440, F.A.C.]

6. Visible Emission Tests Required: The owner or operator shall demonstrate compliance with the visible emissions limit for this emissions unit upon initial installation and annually using EPA Method 9, as described in 40 CFR 60 Appendix A. Whenever [Rules 62-4.070(3) and 62-297.310, F.A.C.]

REPORTING AND RECORD KEEPING REQUIREMENTS

7. Fuel Sulfur Content Records: The owner or operator shall maintain records of sulfur content of each delivery of distillate fuel oil received for these emissions units, made pursuant to the requirements of specific condition 5 of this section. [Rule 62-4.070(3), F.A.C.]

8. Distillate Fuel Oil Consumption Records: The owner or operator shall make and maintain monthly records of natural gas and distillate fuel oil consumption for this emissions unit. From the monthly records of consumption of all permitted fuels, the owner or operator shall make records of the consecutive 12-month fuel consumption to demonstrate compliance with the fuel consumption limits of specific condition 3 of this section. All of these records shall be completed within ten days of the end of each month. [Rule 62-4.070(3), F.A.C.]

9. Records of Design Heat Input Capacity: The owner or operator shall maintain records of the design heat input capacity provided by the boiler's manufacturer or vendor to demonstrate compliance with condition 2 of this section. Such records shall be received prior to installation of this emissions unit, and shall be retained for each such emissions unit installed at the facility for a period of five years from the date of installation. [Rule 62-4.070(3), F.A.C.]

FEDERAL NSPS REQUIREMENTS

REQUIREMENTS OF 40 CFR 60 SUBPART DC AND SUBPART A

10. NSPS Requirements: The owner or operator shall comply with all applicable requirements of 40 CFR 60 Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units, as well as the applicable provisions of 40 CFR 60 Subpart A, General Provisions. [Rule 62-204.800, F.A.C., and 40 CFR 60.40c – 60.48c]

    [Note: The applicable provisions of Subpart Dc appear to be: 40 CFR 60.42c(d), (g), (h)(1), (i) and (j); 40 CFR 60.43c(c) and (d); 40 CFR 60.44c(g) and (h); 40 CFR 60.45c(a)(7); 40 CFR 60.46c(e); 40 CFR60.48c(a), (b), (d), (e), (f), (g), (i) and (j).]

G.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.

G.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 or exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.

G.3 As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey and 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 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.

G.4 This permit conveys no title to land or water, does not constitute State recognition or acknowledgment 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.

G.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.

G.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.

G.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 and 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.

G.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.

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.

G.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 extend it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

G.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.

G.11 This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, 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.

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

G.13 This permit also constitutes:

(a) Determination of Best Available Control Technology (X);
(b) Determination of Prevention of Significant Deterioration ( ); and
(c) Compliance with New Source Performance Standards ( ).

G.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 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 or 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:

1. The date, exact place, and time of sampling or measurements;
2. The person responsible for performing the sampling or measurements;
3. The dates analyses were performed;
4. The person responsible for performing the analyses;
5. The analytical techniques or methods used; and
6. The results of such analyses.

G.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.

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mr. Donald Antenore
Vice President, Mfg.
Tropicana Products, Inc.
PO Box 338
Bradenton, FL 34206

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) B. Date of Delivery

C. Signature

X ☐ Agent ☐ Addressee

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

CALLER SERVICES BRADENTON FL FEB 19 2001

3. Service Type
☑ Certified Mail ☐ Express Mail
☐ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

2. Article Number (Copy from service label) 7099 3400 0000 1449 3881

PS Form 3811, July 1999 Domestic Return Receipt 102595-99-M-1789

7099 3400 0000 1449 3881

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

Article Sent To:
Mr. Donald Antenore, VP, Mfg.

Postage	$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	$

Tropicana Products, Inc
Postmark Here

Name (Please Print Clearly) (to be completed by mailer)
Mr. Donald Antenore

Street, Apt. No., or PO Box No.
PO Box 338

City, State, ZIP+4
Bradenton, Fl 34206

PS Form 3800, July 1999 See Reverse for Instructions

Memorandum

Florida Department of
Environmental Protection

TO: Howard L. Rhodes

THRU: Clair Fancy

FROM: Joe Kahn

DATE: February 9, 2001

SUBJECT: Tropicana Products, Inc.
Standby Process Steam Boiler

Attached for approval and signature is construction permit to allow Tropicana Products, Inc. to install a portable standby process steam boiler at its Bradenton facility. The applicant intends to use this boiler as a supplemental source of steam to meet steam needs. Currently steam is provided primarily by the facility's cogeneration unit and its auxiliary boiler. This permitting action will allow the applicant the flexibility to install the portable boiler or remove it in accordance with the applicant's needs. The applicant is not limited to the use of any particular make or model boiler, and the length of time the boiler may be located at the facility is not limited. Further, the applicant may install and remove a boiler, and then install it or another boiler again, as needed. The permit term is five years, to allow for the installation and removal of the boiler as needed over that period of time.

The Public Notice requirements have been met on January 25, 2001 by publishing in the Bradenton Herald. No comments were received.

I recommend your approval and signature.

Day 90 is May 4, 2001.

Attachments

/jk

Tropicana

VIA AIRBORNE EXPRESS
January 30, 2001

Mr. A. A. Linero, P.E.
FDEP Bureau of Air Regulation
2600 Blair Stone Road
Mail Station #5505
Tallahassee, FL 32399-2400

RE: STANDBY PROCESS STEAM BOILER
DEP PERMIT FILE NO. 0810007-008-AC

Dear Mr. Linero:

Enclosed please find an affidavit of publication of the Notice of Intent to Issue Air Construction Permit for a portable standby process steam boiler to Tropicana Products, Inc., for the Bradenton citrus processing plant.

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

Sincerely,

Douglas Foster/jlb

Douglas E. Foster
Director, Corporate Environmental & Safety

jlb

Enclosure
cc: J. Kahn
B. Thomas, SWD

Tropicana Products, Inc. P.O. Box 338, Bradenton, Florida 34206 1001 13th Avenue E., Bradenton, Florida 34208
941-747-4461 800-828-2102

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

RECEIVED

JAN 31 2001

BUREAU OF AIR REGULATION

Bradenton Herald
Published Daily
Bradenton, Manatee, Florida

STATE OF FLORIDA
COUNTY OF MANATEE;

Before the undersigned authority personally appeared Sheila Dalesio, 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 in the Court, was published in said newspaper in the issues of JANUARY 25, 2001.

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.

Sheila Dalesio
(Signature of Affiant)

Sworn to and subscribed before me this
25th Day of January, 2001

DIANE S. BACRO
Notary Public - State of Florida
My Commission Expires Aug 15, 2003
Commission # CC863180

Diane S. Bacro
SEAL & Notary Public

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

PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
DEP FILE No. 0810007-008-AC
TROPICANA PRODUCTS, INC.
MANATEE COUNTY

The Department of Environmentcl 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 13rh Ave., Bradenton, Manatee County. The **applicant's mailing address: P.O. Box 338, Bradenton, Florida 34206.** The permit is to allow the occasional temporary installation of a standby process steam boiler with a physical capacity of 99mmBtu/hour or less, that fires natural gas and low sulfur distillate fuel oil (0.05% sulfur by weight). This permitting action will allow the applicant the flexibility to install the portable boiler or remove it in accordance with the applicant's needs. The applicant is not limited to the use of any particular make or model boiler, and the length of time the boiler may be located at the facility is not limited. Further, the applicant may install and remove a boiler, and then install it or another boiler again, as needed. The permit term is five years, to allow for the installation and removal of the boiler as needed over that period of time. This project is not subject to the requirements for PSD. An air quality Impact analysis was not required.

Total emissions of pollutants from the fuel change authorized by this permit will not exceed the following approximate annual emission rates in tons per year. PM, 1.2; SO2, 2.7; NOx, 30.6; CO, 21.6; VOC, 1.4.

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 120.569 and 120.57 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.

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 of the Florida Statutes. The petition must contain the information as 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) of the Florida Statutes must be filed within fourteen days of publication of the public notice or with fourteen days of receipt of this notice of intent, whichever occurs first. Under section 120.60(3), however, any person who asked the Department 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 appropriate 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.

A petition that disputes the material facts on which the Department'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 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 petition must so indicate;
(e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's action; and
(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 Department'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.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that 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 such final decision of the Department 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, 8:00am to 5:00pm, Monday through Friday, except legal holidays, at:

Dept. of Environmental Protection
Bureau of Air Regulation
Suite 4,111 S. Magnolia Dr.
Tallahassee, Fl. 32301
Telephone 850-488-0114
FAX: 850-922-6979

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

The complete project file includes the application, technical evaluations, 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, New Source Review Section, or the Department's reviewing engineer for this project, Joseph Kahn, P.E., 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.
1/25/01

Department of Environmental Protection

Jeb Bush
Governor

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

David B. Struhs
Secretary

January 19, 2001

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Donald Antenore
Vice President, Mfg.
Tropicana Products, Inc.
PO Box 338
Bradenton, Florida 34206

Re: DEP File No. 0810007-008-AC
Standby Process Steam Boiler

Dear Mr. Antenore:

Enclosed is one copy of the draft air construction permit to Tropicana Products, Inc. to allow the installation of a portable standby process steam boiler with a physical capacity of 99 mmBtu/hour or less, that fires natural gas and very low sulfur distillate fuel oil (0.05% sulfur by weight), at its citrus juice processing plant located at 1001 13th Avenue, Bradenton, Manatee County. The Technical Evaluation and Determination, the Department's Intent to Issue Air Construction Permit and the Public Notice of Intent to Issue Air Construction Permit are also included.

The Public Notice of Intent to Issue Air Construction Permit must be published one time only, as soon as possible, in the legal advertisement section of a newspaper of general circulation in the area affected, pursuant to the requirements Chapter 50, Florida Statutes. Proof of publication, i.e., newspaper affidavit, must be provided to the Department's Bureau of Air Regulation office within seven days of publication. Failure to publish the notice and provide proof of publication may result in the denial of the permit.

Please submit any written comments you wish to have considered concerning the Department's proposed action to A. A. Linero, P.E., Administrator, New Source Review Section at the above letterhead address. If you have any other questions, please contact Joseph Kahn, P.E., at 850/921-9509 or Mr. Linero at 850/488-0114.

Sincerely,

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

CHF/jk

Enclosures

In the Matter of an
Application for Permit by:

Donald Antenore, Vice President, Mfg.
Tropicana Products, Inc.
PO Box 338
Bradenton, Florida 34206

DEP File No. 0810007-008-AC
Standby Process Steam Boiler
Manatee County

INTENT TO ISSUE AIR CONSTRUCTION PERMIT

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit (copy of draft permit attached) for the proposed project, detailed in the application specified above and the enclosed Technical Evaluation and Preliminary Determination, for the reasons stated below.

The applicant, Tropicana Products, Inc., applied on January 10, 2001, to the Department for an air construction permit for its existing citrus juice processing facility located at 1001 13th Avenue, Bradenton, Manatee County. The permit is to allow the installation of a portable standby process steam boiler with a physical capacity of 99 mmBtu/hour or less, that fires natural gas and low sulfur distillate fuel oil (0.05% sulfur by weight). This permitting action will allow the applicant the flexibility to install the portable boiler or remove it in accordance with the applicant's needs. The applicant is not limited to the use of any particular make or model boiler, and the length of time the boiler may be located at the facility is not limited. Further, the applicant may install and remove a boiler, and then install it or another boiler again, as needed. The permit term is five years, to allow for the installation and removal of the boiler as needed over that period of time.

The Department has permitting jurisdiction under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, and 62-212. The above actions are not exempt from permitting procedures. The Department has determined that an air construction permit is required to perform the proposed work.

The Department intends to issue this air construction permit based on the belief that reasonable assurances have been provided to indicate that operation of these emission units will not adversely impact air quality, and the emission units will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C.

Pursuant to Section 403.815, F.S., and Rule 62-110.106(7)(a)1., F.A.C., you (the applicant) are required to publish at your own expense the enclosed Public Notice of Intent to Issue Air Construction Permit. The notice shall be published one time only in the legal advertisement section of a newspaper of general circulation in the area affected. Rule 62-110.106(7)(b), F.A.C., requires that the applicant cause the notice to be published as soon as possible after notification by the Department of its intended action. For the purpose of these rules, "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. 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, at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400 (Telephone: 850/488-0114; Fax 850/ 922-6979). You must provide proof of publication within seven days of publication, pursuant to Rule 62-110.106(5), F.A.C. No permitting action for which published notice is required shall be granted until proof of publication of notice is made by furnishing a uniform affidavit in substantially the form prescribed in section 50.051, F.S. to the office of the Department issuing the permit. Failure to publish the notice and provide proof of publication may result in the denial of the permit pursuant to Rules 62-110.106(9) & (11), F.A.C.

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 Public Notice of Intent to Issue Air 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 120.569 and 120.57 F.S., before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below.

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 of the 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 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) of the Florida Statutes 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), however, any person who asked the Department 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 appropriate 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.

A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and 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 petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the 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 Department'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.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that 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 such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation is not available in this proceeding.

In addition to the above, a person subject to regulation has a right to apply for a variance from or waiver of the requirements of particular rules, on certain conditions, under Section 120.542 F.S. The relief provided by this state statute applies only to state rules, not statutes, and not to any federal regulatory requirements. Applying for a variance or waiver does not substitute or extend the time for filing a petition for an administrative hearing or exercising any other right that a person may have in relation to the action proposed in this notice of intent.

The application for a variance or waiver is made by filing a petition with the Office of General Counsel of the Department, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. The petition must specify the following information: (a) The name, address, and telephone number of the petitioner; (b) The name, address, and telephone number of the attorney or qualified representative of the petitioner, if any; (c) Each rule or portion of a rule from which a variance or waiver is requested; (d) The citation to the statute underlying (implemented by) the rule identified in (c) above; (e) The type of action requested; (f) The specific facts that would

justify a variance or waiver for the petitioner; (g) The reason why the variance or waiver would serve the purposes of the underlying statute (implemented by the rule); and (h) A statement whether the variance or waiver is permanent or temporary and, if temporary, a statement of the dates showing the duration of the variance or waiver requested.

The Department will grant a variance or waiver when the petition demonstrates both that the application of the rule would create a substantial hardship or violate principles of fairness, as each of those terms is defined in Section 120.542(2) F.S., and that the purpose of the underlying statute will be or has been achieved by other means by the petitioner.

Persons subject to regulation pursuant to any federally delegated or approved air program should be aware that Florida is specifically not authorized to issue variances or waivers from any requirements of any such federally delegated or approved program. The requirements of the program remain fully enforceable by the Administrator of the EPA and by any person under the Clean Air Act unless and until the Administrator separately approves any variance or waiver in accordance with the procedures of the federal program.

Executed in Tallahassee, Florida.

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

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Intent to Issue Air Construction Permit (including the Public Notice of Intent to Issue Air Construction Permit, Technical Evaluation and Preliminary Determination, and the Draft permit) was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 1/19/01 to the person(s) listed:

Mr. Donald Antenore, Tropicana Products, Inc. *
Mr. Ken Kosky, P.E., Golder
Mr. Bill Thomas, P.E., DEP SWD
Mr. Marion Forthoffer, Manatee Co. EMD

Clerk Stamp

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

Charlotte J. Hayes 1/19/01
(Clerk) (Date)

PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

DEP File No. 0810007-008-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, Florida 34206. The permit is to allow the occasional temporary installation of a standby process steam boiler with a physical capacity of 99 mmBtu/hour or less, that fires natural gas and low sulfur distillate fuel oil (0.05% sulfur by weight). This permitting action will allow the applicant the flexibility to install the portable boiler or remove it in accordance with the applicant's needs. The applicant is not limited to the use of any particular make or model boiler, and the length of time the boiler may be located at the facility is not limited. Further, the applicant may install and remove a boiler, and then install it or another boiler again, as needed. The permit term is five years, to allow for the installation and removal of the boiler as needed over that period of time. This project is not subject to the requirements for PSD. An air quality impact analysis was not required.

Total emissions of pollutants from the fuel change authorized by this permit will not exceed the following approximate annual emission rates in tons per year: PM, 1.2; SO_2, 2.7; NOx, 30.6; CO, 21.6; VOC, 1.4.

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 120.569 and 120.57 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.

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 of the 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 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) of the Florida Statutes 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), however, any person who asked the Department 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 appropriate 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.

NOTICE TO BE PUBLISHED IN THE NEWSPAPER

A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and 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 petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the 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 Department'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

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that 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 such final decision of the Department 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:

Dept. of Environmental Protection
Bureau of Air Regulation
Suite 4, 111 S. Magnolia Drive
Tallahassee, Florida, 32301
Telephone: 850/488-0114
Fax: 850/922-6979

Dept. of Environmental Protection
Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619-8218
Telephone: 813/744-6100

The complete project file includes the application, technical evaluations, 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, New Source Review Section, or the Department's reviewing engineer for this project, Joseph Kahn, P.E., 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.

NOTICE TO BE PUBLISHED IN THE NEWSPAPER

Department of Environmental Protection

Jeb Bush
Governor

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

David B. Struhs
Secretary

P.E. Certification Statement

Tropicana Products, Inc.
Standby Process Steam Boiler

DEP File No.: 0810007-008-AC
Facility ID No.: 0810007

Project: Air Construction Permit

I HEREBY CERTIFY that the engineering features described in the above referenced application and related additional information submittals, if any, and subject to the proposed permit conditions, provide reasonable assurance of compliance with applicable provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 62-4 and 62-204 through 62-297. However, I have not evaluated and I do not certify aspects of the proposal outside of my area of expertise (including but not limited to the electrical, mechanical, structural, hydrological, and geological features).

This review was conducted by me.

(Seal)

Joseph Kahn, P.E.
Registration # 45268

1/19/01
Date

Permitting Authority:
Florida Department of Environmental Protection
Division of Air Resources Management
Bureau of Air Regulation
New Source Review Section
Mail Station #5505
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Telephone: 850/488-0114
Fax: 850/922-6979

1 APPLICANT NAME AND ADDRESS

Tropicana Products, Inc.
PO Box 338
Bradenton, Florida 34206

Authorized Representative: Donald Antenore, Vice President, Mfg.

2 FACILITY DESCRIPTION, PROJECT DETAILS AND RULE APPLICABILITY

The facility is an existing citrus juice processing facility. The project is the installation of a portable standby process steam boiler with a physical capacity of 99 mmBtu/hour or less, that fires natural gas and very low sulfur distillate fuel oil (0.05% sulfur by weight). The applicant intends to use this boiler as a supplemental source of steam to meet steam needs. Currently steam is provided primarily by the facility's cogeneration unit (EU 016) and its auxiliary boiler (EU 015). This permitting action will allow the applicant the flexibility to install the portable boiler or remove it in accordance with the applicant's needs. The applicant is not limited to the use of any particular make or model boiler, and the length of time the boiler may be located at the facility is not limited. Further, the applicant may install and remove a boiler, and then install it or another boiler again, as needed. The permit term is five years, to allow for the installation and removal of the boiler as needed over that period of time. The applicant did not seek any relaxation in currently enforceable conditions in its existing emissions units.

Emissions units addressed by this permit are the standby process steam boiler, new emissions unit 025.

The emissions increases associated with this project were estimated as follows in tons per year. No offsetting emissions from the cogeneration unit or the auxiliary boiler were assumed in this estimate.

Pollutant	Net Increase [1]	PSD Significance	Subject to PSD?
PM/ PM_{10}	1.2	25/15	No
SO_2	2.7	40	No
NOx	30.6	40	No
CO	21.6	100	No
VOC	1.4	40	No

[1] Potential emissions (shown as net increase) were estimated by the Department from allowable natural gas and distillate fuel oil usage and AP-42 emission factors (tables 1.3-1 and 1.3-3 for fuel oil, tables 1.4-1 and 1.4-2 for natural gas), assuming a higher heat content of 1050 Btu/scf of natural gas and 140 million Btu/1000 gallons of distillate fuel oil, given a design heat input capacity of 99 mmBtu/hour, and the fuel use limits of the permit.

The proposed project is subject to preconstruction review requirements under the provisions of Chapter 403, F.S., and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297, F.A.C. The existing facility is located in an area designated, in accordance with Rule 62-204.340, F.A.C., as attainment or unclassifiable for the criteria pollutants ozone, PM_{10}, carbon monoxide, SO_2, nitrogen dioxide and lead. This facility is classified as a Major or Title V Source of air pollution because emissions of at least one regulated air pollutant exceeds 100 tons per year (TPY). The Department has previously found that citrus juice processing facilities such as this facility have potential emissions of VOC exceed 250 TPY.

This facility is not within an industry included in the list of the 28 Major Facility Categories per Table 62-212.400-1 of Chapter 62-212, F.A.C. Because emissions are greater than 250 TPY for at least one criteria pollutant (VOC), the facility is also an existing Major Facility with respect to Rule 62-212.400, Prevention of Significant Deterioration (PSD). The net increase in emissions of PM/PM_{10}, NOx, SO_2, CO and VOC do not exceed the PSD significance levels of Table 212.400-2, F.A.C. Therefore the project is not subject to PSD requirements of Rule 62-212.400,F.A.C., for these pollutants.

The portable standby process steam boiler is subject to regulation under the New Source Performance Standards of 40 CFR 60, Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units. This emissions unit is also subject to a determination of Best Available Control Technology (BACT) pursuant to Rule 62-296.406, F.A.C. The applicant requested that BACT be determined to be the use of natural gas and 0.5% sulfur distillate fuel oil. BACT for small boilers is typically the use of natural gas and 0.05% sulfur distillate fuel oil, so the applicant's request is not consistent with the Department's previous BACT determinations. The Department's determination for this project is that BACT shall be the use of natural gas as the primary fuel, with very low sulfur (0.05% by weight) fuel oil allowed as a backup fuel. Fuel consumption will be further limited, to limit natural gas consumption to the equivalent of approximately 5000 full load hours, and distillate fuel oil consumption to the equivalent of approximately 1000 full load hours (assuming a design heat input of 99 mmBtu/hour). (Because fuel consumption is limited by the permit, the hours of operation are not limited.)

The rationale for the Department's BACT determination is that sulfur in fuel is a primary air pollution concern since most of the fuel sulfur becomes sulfur dioxide, and particulate matter emissions from fuel burning are related to the sulfur content. Reducing the allowable sulfur content of the fuels burned will reduce the emissions of sulfur dioxide and particulate matter. Natural gas has the lowest sulfur content of the typically available fuels. Burning of natural gas results in relatively lower emissions of other criteria pollutants as compared with firing fuel oil, with the exception of nitrogen oxides which are higher. Thus, for the majority of pollutants, including particulate matter and sulfur dioxide, the use of natural gas is the best alternative. Fuel oil is permitted as a backup fuel, although its use is limited because of its higher sulfur content.

The applicant stated that this facility is a major source of hazardous air pollutants (HAPs). This project is not subject to a case-by-case MACT determination, per Rule 62-204.800(10)(d)2, F.A.C., because it does not result in the construction or reconstruction of a major source of HAP emissions. This project is not subject to any requirements under the National Emissions Standards for Hazardous Air Pollutants, 40 CFR 61 or 63.

3 SOURCE IMPACT ANALYSIS

An impact analysis was required for this project because it is not subject to the requirements of PSD.

4 EXCESS EMISSIONS

Excess emissions for this emissions unit are specified in Section II of the permit. This permitting action does not change any authorization for excess emissions provided by other Department permits for other emissions units. The excess emissions provisions of state rule can not be used to vary any NSPS requirements applicable to this emissions unit.

5 LIMITS AND COMPLIANCE REQUIREMENTS

The permit limits the sulfur content of the distillate fuel oil and limits the heat input to the emissions units from all permitted fuels. Specific emission limits were not imposed because the potential emissions are well below the PSD significance criteria. The fuel consumption limits, reference to the applicable NSPS requirements, and the compliance requirements are detailed in Section III of the permit.

6 PRELIMINARY DETERMINATION

Based on the foregoing technical evaluation of the application and additional information submitted by the applicant and other available information, the Department has made a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations. The

Department's preliminary determination is to issue the draft permit to allow the installation of a portable standby process steam boiler, subject to the terms and conditions of the draft permit.

7 FINAL DETERMINATION

^DRAFT (This section will be revised when a final permit is issued for this project.)

DETAILS OF THIS ANALYSIS MAY BE OBTAINED BY CONTACTING:

Joseph Kahn, P.E.
Department of Environmental Protection
Bureau of Air Regulation
Mail Station #5505
2600 Blair Stone Road
Tallahassee, Florida 32399-2400
Telephone: 850/488-0114

Recommended by:

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

Date

Approved by:

Howard L. Rhodes, Director
Division of Air Resources Management

Date

PERMITTEE

Tropicana Products, Inc.
PO Box 338
Bradenton, Florida 34206

Permit No.	0810007-008-AC
Project	Standby Process Steam Boiler
SIC No.	2033, 2037, 2048
Expires:	^DRAFT

Authorized Representative:

Donald Antenore, Vice President, Mfg.

PROJECT AND LOCATION

This permit authorizes Tropicana Products, Inc. to install a portable standby process steam boiler with a physical capacity of 99 mmBtu/hour or less, that fires natural gas and very low sulfur distillate fuel oil (0.05% sulfur by weight).

This facility is located at 1001 13th Avenue, Bradenton, Manatee County. The UTM coordinates are: Zone 17; 561.4 km E and 3056.5 km N.

STATEMENT OF BASIS

This construction permit is issued under the provisions of Chapter 403 of the Florida Statutes (F.S.), and the Florida Administrative Code (F.A.C.) Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297. The above named permittee is authorized to construct the emissions units in accordance with the conditions of this permit and as described in the application, approved drawings, plans, and other documents on file with the Department of Environmental Protection (Department).

APPENDICES

The attached appendix is a part of this permit:

Appendix GC General Permit Conditions

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Howard L. Rhodes, Director
Division of Air Resources
Management

FACILITY AND PROJECT DESCRIPTION

The facility is an existing citrus juice processing facility. The project is the installation of a portable standby process steam boiler with a physical capacity of 99 mmBtu/hour or less, that fires natural gas and very low sulfur distillate fuel oil (0.05% sulfur by weight). This boiler will be emissions unit 025. The applicant intends to use this boiler as a supplemental source of steam to meet steam needs. Currently steam is provided primarily by the facility's cogeneration unit (EU 016) and its auxiliary boiler (EU 015). This permit allows the applicant the flexibility to install the portable boiler or remove it in accordance with the applicant's needs. The applicant is not limited to the use of any particular make or model boiler, and the length of time the boiler may be located at the facility is not limited. Further, the applicant may install and remove a boiler, and then install it or another boiler again, as needed. The permit term is five years, to allow for the installation and removal of the boiler as needed over that period of time.

The annual potential emissions associated with this project in tons per year are approximately: PM/PM_{10}, 1.2; NOx, 30.6; SO_2, 2.7; CO, 21.6; and VOC, 1.4. The facility information, project scope, emissions and rule applicability are described in detail in the Department's Technical Evaluation and Determination.

REVIEWING AND PROCESS SCHEDULE

January 10, 2001	Received permit application (no application fee required)
January 10, 2001	Application complete
^DRAFT	Distributed Notice of Intent to Issue and supporting documents
^DRAFT	Notice of Intent published in ^DRAFT

RELEVANT DOCUMENTS

The documents listed below are the basis of the permit. They are specifically related to this permitting action. These documents are on file with the Department.

- Permit application
- Department's Technical Evaluation and Determination
- Department's Intent to Issue

The following specific conditions apply to all emissions units at this facility addressed by this permit.

ADMINISTRATIVE

1. Regulating Agencies: All documents related to applications for permits to construct, operate or modify an emissions unit should be submitted to the Bureau of Air Regulation (BAR), Florida Department of Environmental Protection at Mail Station #5505, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, phone number 850/488-0114. All documents related to reports, tests, minor modifications and notifications shall be submitted to the Department's Southwest District office at 3804 Coconut Palm Drive, Tampa, Florida 33619-8218, and phone number 813-744-6100.
2. General Conditions: The owner and operator is subject to and shall operate under the attached General Permit Conditions G.1 through G.15 listed in Appendix GC of this permit. General Permit Conditions are binding and enforceable pursuant to Chapter 403 of the Florida Statutes. [Rule 62-4.160, F.A.C.]
3. Terminology: The terms used in this permit have specific meanings as defined in the corresponding chapters of the Florida Administrative Code.
4. Applicable Regulations, Forms and Application Procedures: Unless otherwise indicated in this permit, the construction and operation of the subject emissions unit shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of Chapter 403, F.S. and Florida Administrative Code Chapters 62-4, 62-110, 62-204, 62-212, 62-213, 62-296, 62-297 and the Code of Federal Regulations Title 40, Part 60, adopted by reference in the Florida Administrative Code (F.A.C.) regulations. The permittee shall use the applicable forms listed in Rule 62-210.900, F.A.C. and follow the application procedures in Chapter 62-4, F.A.C. Issuance of this permit does not relieve the facility owner or operator from compliance with any applicable federal, state, or local permitting or regulations. [Rules 62-204.800, 62-210.300 and 62-210.900, F.A.C.]
5. New or Additional Conditions: Pursuant to Rule 62-4.080, F.A.C., for good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]
6. Expiration: This air construction permit shall expire on ^DRAFT. The permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the Department's Bureau of Air Regulation prior to 60 days before the expiration of the permit. [Rules 62-210.300(1), 62-4.070(4), 62-4.080, and 62-4.210, F.A.C]
7. Modifications: No emissions unit or facility subject to this permit shall be constructed or modified without obtaining an air construction permit from the Department. Such permit must be obtained prior to the beginning of construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]
8. Title V Operation Permit Required: This permit authorizes construction and/or installation of the permitted emissions unit and initial operation to determine compliance with Department rules. A revision to the Title V operation permit is required for regular operation of the permitted emissions

unit. The owner or operator shall apply for a Title V operation permit at least ninety days prior to expiration of this permit, but no later than 180 days after commencing operation. To apply for a Title V operation permit, the applicant shall submit the appropriate application form, compliance test results, and such additional information as the Department may by law require. The application shall be submitted to the Department's Southwest District office. [Rules 62-4.030, 62-4.050, 62-4.220, and Chapter 62-213, F.A.C.]

OPERATIONAL REQUIREMENTS

9. Plant Operation - Problems: If temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by hazard of fire, wind or by other cause, the permittee shall immediately notify the Department's Southwest District office. The notification shall include pertinent information as to the cause of the problem, and what steps are being taken to correct the problem and to prevent its recurrence, and where applicable, the owner's intent toward reconstruction of destroyed facilities. Such notification does not release the permittee from any liability for failure to comply with Department rules. [Rule 62-4.130, F.A.C.]

10. Circumvention: No person shall circumvent any air pollution control device or allow the emission of air pollutants without the applicable air pollution control device operating properly. [Rule 62-210.650, F.A.C.]

11. Excess Emissions: This permit does not change any authorization for excess emissions provided by other Department permits for other emissions units. The following excess emissions provisions of state rule apply to this emissions unit (emissions unit 025) as specified below. These provisions can not be used to vary any NSPS requirements applicable to this emissions unit.

    (a) Excess emissions resulting from start-up and shutdown are permitted for emissions unit 025 providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized, but in no case exceed two hours in any 24 hour period.

    (b) Excess emissions resulting from malfunction of this emissions unit shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized, but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration.

    (c) Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during start-up, shutdown, or malfunction shall be prohibited.

    [Rules 62-210.700(1), (4) and (5), F.A.C.]

COMPLIANCE MONITORING AND TESTING REQUIREMENTS

12. Determination of Process Variables: [Rule 62-297.310(5), F.A.C.]

    (a) Required Equipment. The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.

    (b) Accuracy of Equipment. Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.

REPORTING AND RECORD KEEPING REQUIREMENTS

13. Duration of Record Keeping: 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. The permittee shall hold 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) 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 five years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule. [Rules 62-4.160(14)(a)&(b) and 62-213.440(1)(b)2.b., F.A.C.]

14. Excess Emissions Report: In case of excess emissions resulting from malfunction, the owner or operator shall notify the Department's Southwest District office within one working day of: the nature, extent, and duration of the excess emissions; the cause of the excess emissions; and the actions taken to correct the problem. In addition, the Department may request a written summary report of the incident. A full written report on the malfunctions shall be submitted in a quarterly report if requested by the Department. [Rules 62-4.130 and 62-210.700(6), F.A.C.]

15. Annual Operating Report for Air Pollutant Emitting Facility: The Annual Operating Report for Air Pollutant Emitting Facility shall be completed each year and shall be submitted to the Department's Southwest District office and, if applicable, the appropriate local program by March 1 of the following year. [Rule 62-210.370(3), F.A.C.]

The following specific conditions apply to the following emissions units after construction.

EMISSIONS UNIT NO.	EMISSIONS UNIT DESCRIPTION
025	Standby process steam boiler

[Note: This emissions unit is a portable standby process steam boiler that is installed to serve as a supplemental source of steam to meet steam needs. This boiler is limited to one of a physical capacity of 99 mmBtu/hour or less, that fires natural gas and very low sulfur distillate fuel oil (0.05% sulfur by weight). This permit allows the applicant the flexibility to install the portable boiler or remove it in accordance with the applicant's needs. The applicant is not limited to the use of any particular make or model boiler, and the length of time the boiler may be located at the facility is not limited. Further, the applicant may install and remove a boiler, and then install it or another boiler again, as needed. This emissions unit is subject to the requirements of the state rules as indicated in this permit. This emissions unit is subject to a determination of Best Available Control Technology pursuant to Rule 62-296.406, F.A.C. The fuel authorized by this permit is consistent with that BACT determination. This emissions unit is also subject to regulation under the New Source Performance Standards of 40 CFR 60, Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units.]

STATE RULE REQUIREMENTS

OPERATIONAL REQUIREMENTS

1. Hours of Operation: This emissions unit may operate up to 8,760 hours/year. [Rules 62-4.070(3) and 62-210.200, F.A.C., and limitation on potential to emit]

2. Design Heat Input Capacity Limited: The design heat input capacity of this emissions unit shall be limited to a maximum of 99 mmBtu per hour, based on the physical design and characteristics of the steam generation unit. [Rules 62-4.070(3) and 62-210.200, F.A.C., and limitation on potential to emit]

3. Fuel Consumption Limited: This emission unit shall primarily be fired with natural gas. Distillate fuel oil with a maximum sulfur content of 0.05 percent, by weight, may be used as a backup fuel. Natural gas consumption by this emissions unit shall not exceed 471 million standard cubic feet in any consecutive 12-month period. Distillate fuel oil consumption by this emissions unit shall not exceed 707 thousand gallons in any consecutive 12-month period. [Rules 62-4.070(3), 62-210.200 and 62-296.406, F.A.C., BACT for small boilers, and limitation on potential to emit]

   [Note: This condition limits natural gas usage to the equivalent of 5000 hours per year, and distillate fuel oil consumption to the equivalent of 1000 hours per year, assuming a heat input of 99 mmBtu/hour and an average HHV of 1050 mmBtu/million scf of natural gas and 140 mmBtu/1000 gallons of fuel oil.]

4. Visible Emissions Limited: Visible emissions from this emissions unit shall not exceed 20 percent opacity except for one six-minute period per hour during which opacity shall not exceed 27 percent. [Rule 62-296.406(1), F.A.C.]

COMPLIANCE MONITORING AND TESTING REQUIREMENTS

5. Fuel Sulfur Content Tests: The owner or operator shall determine the sulfur content of each delivery of distillate fuel oil received for these emissions units using ASTM D4057-88, Standard Practice for Manual Sampling of Petroleum and Petroleum Products, and one of the following test methods for sulfur in petroleum products: ASTM D129-91, ASTM D1552-90, ASTM D2622-94, or ASTM D4294-90. A more recent version of these methods may be used. The owner or operator may comply with this requirement by receiving records from the fuel supplier that indicate the sulfur content of the distillate fuel oil delivered complies with the sulfur limit of specific condition 3 of this section. [Rules 62-4.070(3) and 62-297.440, F.A.C.]

6. Visible Emission Tests Required: The owner or operator shall demonstrate compliance with the visible emissions limit for this emissions unit upon initial installation and annually using EPA Method 9, as described in 40 CFR 60 Appendix A. Whenever [Rules 62-4.070(3) and 62-297.310, F.A.C.]

REPORTING AND RECORD KEEPING REQUIREMENTS

7. Fuel Sulfur Content Records: The owner or operator shall maintain records of sulfur content of each delivery of distillate fuel oil received for these emissions units, made pursuant to the requirements of specific condition 5 of this section. [Rule 62-4.070(3), F.A.C.]

8. Distillate Fuel Oil Consumption Records: The owner or operator shall make and maintain monthly records of natural gas and distillate fuel oil consumption for this emissions unit. From the monthly records of consumption of all permitted fuels, the owner or operator shall make records of the consecutive 12-month fuel consumption to demonstrate compliance with the fuel consumption limits of specific condition 3 of this section. All of these records shall be completed within ten days of the end of each month. [Rule 62-4.070(3), F.A.C.]

9. Records of Design Heat Input Capacity: The owner or operator shall maintain records of the design heat input capacity provided by the boiler's manufacturer or vendor to demonstrate compliance with condition 2 of this section. Such records shall be received prior to installation of this emissions unit, and shall be retained for each such emissions unit installed at the facility for a period of five years from the date of installation. [Rule 62-4.070(3), F.A.C.]

FEDERAL NSPS REQUIREMENTS

REQUIREMENTS OF 40 CFR 60 SUBPART DC AND SUBPART A

10. NSPS Requirements: The owner or operator shall comply with all applicable requirements of 40 CFR 60 Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units, as well as the applicable provisions of 40 CFR 60 Subpart A, General Provisions. [Rule 62-204.800, F.A.C., and 40 CFR 60.40c – 60.48c]

    [Note: The applicable provisions of Subpart Dc appear to be: 40 CFR 60.42c(d), (g), (h)(1), (i) and (j); 40 CFR 60.43c(c) and (d); 40 CFR 60.44c(g) and (h); 40 CFR 60.45c(a)(7); 40 CFR 60.46c(e); 40 CFR60.48c(a), (b), (d), (e), (f), (g), (i) and (j).]

G.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.

G.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 or exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.

G.3 As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey and 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 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.

G.4 This permit conveys no title to land or water, does not constitute State recognition or acknowledgment 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.

G.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.

G.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.

G.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 and 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.

G.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.

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.

G.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 extend it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

G.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.

G.11 This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, 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.

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

G.13 This permit also constitutes:

(a) Determination of Best Available Control Technology (X);
(b) Determination of Prevention of Significant Deterioration ( ); and
(c) Compliance with New Source Performance Standards ( ).

G.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 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 or 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:

1. The date, exact place, and time of sampling or measurements;
2. The person responsible for performing the sampling or measurements;
3. The dates analyses were performed;
4. The person responsible for performing the analyses;
5. The analytical techniques or methods used; and
6. The results of such analyses.

G.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.

SENDER: *COMPLETE THIS SECTION*

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mr. Donald Antenore
Vice President, Mfg.
Tropicana Products, Inc.
P. O. Box 338
Bradenton, FL 34206

COMPLETE THIS SECTION ON DELIVERY

A. Received by *(Please Print Clearly)* Jon Baker — B. Date of Delivery

C. Signature
X Jon Baker ☐ Agent ☐ Addressee

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

JAN 22 2001

3. Service Type
☒ Certified Mail ☐ Express Mail
☐ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? *(Extra Fee)* ☐ Yes

2. Article Number *(Copy from service label)*
7099 3400 0000 1453 2719

PS Form 3811, July 1999 Domestic Return Receipt 102595-99-M-1789

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

Article Sent To:
Mr. Donald Antenore

Postage	$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	$ 1/19/01

Postmark Here

Name (Please Print Clearly) (to be completed by mailer)
Tropicana Products
Street, Apt. No., or PO Box No.
P.O. Box 338
City, State, ZIP+4
Bradenton, FL 34206

PS Form 3800, July 1999 See Reverse for Instructions

7099 3400 0000 1453 2719

Department of Environmental Protection

Jeb Bush
Governor

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

David B. Struhs
Secretary

P.E. Certification Statement

Tropicana Products, Inc.
Standby Process Steam Boiler

DEP File No.: 0810007-008-AC
Facility ID No.: 0810007

Project: Air Construction Permit

I HEREBY CERTIFY that the engineering features described in the above referenced application and related additional information submittals, if any, and subject to the proposed permit conditions, provide reasonable assurance of compliance with applicable provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 62-4 and 62-204 through 62-297. However, I have not evaluated and I do not certify aspects of the proposal outside of my area of expertise (including but not limited to the electrical, mechanical, structural, hydrological, and geological features).

This review was conducted by me.

(Seal)

Joseph Kahn, P.E.
Registration # 45268

1/19/01
Date

Permitting Authority:
Florida Department of Environmental Protection
Division of Air Resources Management
Bureau of Air Regulation
New Source Review Section
Mail Station #5505
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Telephone: 850/488-0114
Fax: 850/922-6979

"More Protection, Less Process"

Printed on recycled paper.

Memorandum

Florida Department of
Environmental Protection

TO: Clair Fancy

THRU: Al Linero

FROM: Joe Kahn

DATE: January 19, 2001

SUBJECT: Tropicana Products, Inc.
Standby Process Steam Boiler

Attached for approval and signature is an intent to issue a construction permit to allow Tropicana Products, Inc. to install a portable standby process steam boiler at its Bradenton facility. The applicant intends to use this boiler as a supplemental source of steam to meet steam needs. Currently steam is provided primarily by the facility's cogeneration unit and its auxiliary boiler. This permitting action will allow the applicant the flexibility to install the portable boiler or remove it in accordance with the applicant's needs. The applicant is not limited to the use of any particular make or model boiler, and the length of time the boiler may be located at the facility is not limited. Further, the applicant may install and remove a boiler, and then install it or another boiler again, as needed. The permit term is five years, to allow for the installation and removal of the boiler as needed over that period of time.

This project is not subject to PSD because the associated emissions increases are not significant for PSD. Total emissions of pollutants from this project will not exceed the approximate annual emission rates in tons per year: PM, 1.2; SO_2, 2.7; NOx, 30.6; CO, 21.6; VOC, 1.4.

I recommend your approval and signature.

January 19, 2001 is day 10 of the 90 day timeclock.

Attachments

/jk

Tropicana®

VIA OVERNIGHT DELIVERY
January 8, 2001

Mr. Joseph Kahn, P.E.
Florida Department of Environmental Protection
Bureau of Air Regulation
Mail Station #5505
2600 Blair Stone Road
Tallahassee, Florida 32339-2400

RE: PERMIT NO. 0810007-003-AV

Dear Mr. Kahn:

Enclosed are four copies of an application for a minor source permit at the above-referenced Title V facility. This application requests approval for Tropicana to bring a mobile steam-generating unit on site during periods when additional steam is needed at the facility. These conditions would exist when either of the existing steam generating units at the facility (Auxiliary Boiler or Cogeneration Turbine) is inoperable. It also would provide Tropicana the flexibility to reduce operation of its Cogeneration facility during periods of high natural gas pricing, such as exists today.

Under separate cover, Tropicana has submitted a request for an emergency order to operate this unit. That request was made due to the severe cold weather we are experiencing, which is limiting our ability to operate the Cogeneration Turbine, coupled with the requirement to salvage freeze-damaged fruit during the next four to seven weeks. Obviously, it would be in our best interest to have this unit permanently permitted, and whatever you can do to expedite this process would be greatly appreciated.

If you have any questions, please contact me at 941-742-2748.

Sincerely,

Douglas E. Foster
Director, Corporate Environmental & Safety

D529/jb

Enclosures
cc: Karen Collins-Manatee Co. Env. Management Dept. (w/enc.)
Deborah Getzoff-FDEP, SWD
G. L. Kissel, P.E., FDEP, SWD
Kennard Kosky, P.E.-Golder Associates
Bill Thomas, P.E.-FDEP, SWD
George Cassady-TPI
Tom Hovanec-TPI

APPLICATION FOR AIR PERMIT
INSTALLATION OF A STANDBY
BOILER FOR TROPICANA PRODUCTS, INC.
BRADENTON CITRUS PROCESSING FACILITY

Prepared For:

Tropicana Products, Inc.
Bradenton Citrus Processing Plant
1001 13th Avenue, East
Bradenton, Manatee 34208

Prepared By:

Golder Associates Inc.
6241 NW 23rd Street, Suite 500
Gainesville, Florida 32653-1500

December 2001
9837588Y/F2

DISTRIBUTION:
4 Copies - FDEP
2 Copies - Tropicana Products, Inc.
1 Copy - Golder Associates Inc.

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2.3 PROPOSED BACT FOR PM 5

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LIST OF ATTACHMENTS

ATTACHMENT A TYPICAL MANUFACTURER INFORMATION FOR THE STANDBY STEAM BOILER

PART I

APPLICATION FOR AIR PERMIT
LONG FORM

Department of Environmental Protection

Division of Air Resources Management

APPLICATION FOR AIR PERMIT - TITLE V SOURCE

See Instructions for Form No. 62-210.900(1)

I. APPLICATION INFORMATION

Identification of Facility

1. Facility Owner/Company Name: **Tropicana Products, Inc.**	
2. Site Name: **Bradenton Citrus Processing Facility**	
3. Facility Identification Number: **0810007** [ ] Unknown	
4. Facility Location: Street Address or Other Locator: **1001 13th Avenue** City: **Bradenton** County: **Manatee** Zip Code: **34208**	
5. Relocatable Facility? [ ] Yes [X] No	6. Existing Permitted Facility? [X] Yes [ ] No

Application Contact

1. Name and Title of Application Contact: **Douglas E. Foster, Manager, Environmental Affairs**
2. Application Contact Mailing Address: Organization/Firm: **Tropicana Products, Inc.** Street Address: **P.O. Box 338** City: **Bradenton** State: **FL** Zip Code: **34206**
3. Application Contact Telephone Numbers: Telephone: (**941**) **742 - 2748** Fax: (**941**) **749 - 3768**

Application Processing Information (DEP Use)

1. Date of Receipt of Application:	1-10-01
2. Permit Number:	0810007-008-AC
3. PSD Number (if applicable):	
4. Siting Number (if applicable):	

Purpose of Application

Air Operation Permit Application

This Application for Air Permit is submitted to obtain: (Check one)

[ ] Initial Title V air operation permit for an existing facility which is classified as a Title V source.

[ ] Initial Title V air operation permit 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:_____

[ ] Title V air operation permit revision to address one or more newly constructed or modified emissions units addressed in this application.

Current construction permit number:_____

Operation permit number to be revised:_____

[ ] Title V air operation permit revision or administrative correction to address one or more proposed new or modified emissions units and to be processed concurrently with the air construction permit application. (Also check Air Construction Permit Application below.)

Operation permit number to be revised/corrected:_____

[ ] Title V air operation permit revision 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 number to be revised:_____

Reason for revision:_____

Air Construction Permit Application

This Application for Air Permit is submitted to obtain: (Check one)

[X] Air construction permit to construct or modify one or more emissions units.

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

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

Owner/Authorized Representative or Responsible Official

1. Name and Title of Owner/Authorized Representative or Responsible Official:
   Donald Antenore, Vice President, Manufacturing
2. Owner/Authorized Representative or Responsible Official Mailing Address:
   Organization/Firm: **Tropicana Products, Inc.**
   Street Address: **P.O. Box 338**
   City: **Bradenton** State: **FL** Zip Code: **34206**
3. Owner/Authorized Representative or Responsible Official Telephone Numbers:
   Telephone: (**941**) **742 - 2023** Fax: (**941**) **749 - 2049**
4. Owner/Authorized Representative or Responsible Official Statement:

   I, the undersigned, am the owner or authorized representative(check here [ ], if so) or the responsible official (check here [ ], if so) 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.*

   Signature Date: 01/07/01

* Attach letter of authorization if not currently on file.

Professional Engineer Certification

1. Professional Engineer Name: **Kennard F. Kosky**
   Registration Number: **14996**
2. Professional Engineer Mailing Address:
   Organization/Firm: **Golder Associates Inc.**
   Street Address: **6241 NW 23rd Street, Suite 500**
   City: **Gainesville** State: **FL** Zip Code: **32653-1500**
3. Professional Engineer Telephone Numbers:
   Telephone: (**352**) **336 - 5600** Fax: (**352**) **336 - 6603**

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

1/5/01
Date

(seal)

* Attach any exception to certification statement.

Scope of Application

Emissions Unit ID	Description of Emissions Unit	Permit Type	Processing Fee
023	Standby Boiler	AC1D	

Application Processing Fee

Check one: [ ] Attached - Amount: $: _____ [X] Not Applicable

Construction/Modification Information

1. Description of Proposed Project or Alterations:

Installation of one 70,000 lb/hr (nominal steam rating) trailer-mounted steam boiler. The boiler will be used to replace or supplement steam generated by the existing cogeneration unit (Emission Unit No. 016) and the auxiliary boiler (Emission Unit No. 015). The unit is capable of firing either natural gas or No. 2 fuel oil. The unit includes a low NO_X burner.

2. Projected or Actual Date of Commencement of Construction: **1 Feb 2001**

3. Projected Date of Completion of Construction: **1 Feb 2001**

Application Comment

The boiler will be used as a supplemental source of steam. Operation of the boiler will supplement steam generated by the cogeneration unit and auxiliary boiler. The facility holds a Title V permit and, therefore, a construction permit fee is not required pursuant to Rule 62-4.050(4)(a)2. While the emission unit will have potential emissions of less than PSD thresholds for a major modification. Therefore PSD review is not required.

II. FACILITY INFORMATION

A. GENERAL FACILITY INFORMATION

Facility Location and Type

1. Facility UTM Coordinates: Zone: **17** East (km): **561.4** North (km): **3056.5**			
2. Facility Latitude/Longitude: Latitude (DD/MM/SS): **27 / 37 / 52** Longitude (DD/MM/SS): **80 / 22 / 33**			
3. Governmental Facility Code: **0**	4. Facility Status Code: **A**	5. Facility Major Group SIC Code: **49**	6. Facility SIC(s): **4911**
7. Facility Comment (limit to 500 characters): **See Attachment Part II.**			

Facility Contact

1. Name and Title of Facility Contact: **Mr. Thomas P. Hovanec, Manager, Environmental and Safety Operations**
2. Facility Contact Mailing Address: Organization/Firm: **Tropicana Products, Inc.** Street Address: **1001 13th Street** City: **Bradenton** State: **FL** Zip Code: **34208**
3. Facility Contact Telephone Numbers: Telephone: (**941**) **742 - 2788** Fax: (**941**) **742 - 2698**

Facility Regulatory Classifications

Check all that apply:

1. [ ] Small Business Stationary Source?	[ ] Unknown
2. [X] Major Source of Pollutants Other than Hazardous Air Pollutants (HAPs)?	
3. [ ] Synthetic Minor Source of Pollutants Other than HAPs?	
4. [X] Major Source of Hazardous Air Pollutants (HAPs)?	
5. [ ] Synthetic Minor Source of HAPs?	
6. [X] One or More Emissions Units Subject to NSPS?	
7. [ ] One or More Emission Units Subject to NESHAP?	
8. [ ] Title V Source by EPA Designation?	
9. Facility Regulatory Classifications Comment (limit to 200 characters): **NSPS Subpart DC applies to the standby steam boiler**	

List of Applicable Regulations

Facility emissions covered under existing Title V permit, no additional facility or emissions unit applicable requirements as a result of the proposed change.

B. FACILITY POLLUTANTS

List of Pollutants Emitted

1. Pollutant Emitted	2. Pollutant Classif.	3. Requested Emissions Cap lb/hour	tons/year	4. Basis for Emissions Cap	5. Pollutant Comment

C. FACILITY SUPPLEMENTAL INFORMATION

Supplemental Requirements

1. Area Map Showing Facility Location: [ ] Attached, Document ID: _____ [X] Not Applicable [ ] Waiver Requested
2. Facility Plot Plan: [ ] Attached, Document ID: _____ [X] Not Applicable [ ] Waiver Requested
3. Process Flow Diagram(s): [ ] Attached, Document ID: _____ [X] Not Applicable [ ] Waiver Requested
4. Precautions to Prevent Emissions of Unconfined Particulate Matter: [ ] Attached, Document ID: _____ [X] Not Applicable [ ] Waiver Requested
5. Fugitive Emissions Identification: [ ] Attached, Document ID: _____ [X] Not Applicable [ ] Waiver Requested
6. Supplemental Information for Construction Permit Application: [X] Attached, Document ID Part II [ ] Not Applicable
7. Supplemental Requirements Comment:

Additional Supplemental Requirements for Title V Air Operation Permit Applications

8. List of Proposed Insignificant Activities:
   [ ] Attached, Document ID:_____ [X] Not Applicable

9. List of Equipment/Activities Regulated under Title VI:
   [ ] Attached, Document ID:_____
   [ ] Equipment/Activities On site but Not Required to be Individually Listed
   [X] Not Applicable

10. Alternative Methods of Operation:
    [ ] Attached, Document ID:_____ [X] Not Applicable

11. Alternative Modes of Operation (Emissions Trading):
    [ ] Attached, Document ID:_____ [X] Not Applicable

12. Identification of Additional Applicable Requirements:
    [ ] Attached, Document ID:_____ [X] Not Applicable

13. Risk Management Plan Verification:
    [ ] Plan previously submitted to Chemical Emergency Preparedness and Prevention Office (CEPPO). Verification of submittal attached (Document ID:_____) or previously submitted to DEP (Date and DEP Office:_____)
    [ ] Plan to be submitted to CEPPO (Date required:_____)
    [X] Not Applicable

14. Compliance Report and Plan:
    [ ] Attached, Document ID:_____ [X] Not Applicable

15. Compliance Certification (Hard-copy Required):
    [ ] Attached, Document ID:_____ [X] Not Applicable

III. EMISSIONS UNIT INFORMATION

A separate Emissions Unit Information Section (including subsections A through J 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.

A. GENERAL EMISSIONS UNIT INFORMATION
(All Emissions Units)

Emissions Unit Description and Status

1. Type of Emissions Unit Addressed in This Section: (Check one)

[X] 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.

2. Regulated or Unregulated Emissions Unit? (Check one)

[X] 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.

3. Description of Emissions Unit Addressed in This Section (limit to 60 characters):

Standby 70,000 lb/hr (Steam) Boiler

4. Emissions Unit Identification Number:
ID:
[ ] No ID
[X] ID Unknown

5. Emissions Unit Status Code:	6. Initial Startup Date:	7. Emissions Unit Major Group SIC Code:	8. Acid Rain Unit?
C	**Feb-01**	**49**	[ ]

9. Emissions Unit Comment: (Limit to 500 Characters)

The standby boiler will be used as a supplementary supply of process steam. The boiler will fire natural gas and no. 2 distillate oil (backup) and is subject to 40 CFR Subpart Dc.

Emissions Unit Control Equipment

1. Control Equipment/Method Description (Limit to 200 characters per device or method):

   Low NO_x Burner - Gas/Oil

2. Control Device or Method Code(s):

Emissions Unit Details

1. Package Unit: **TBD**
   Manufacturer: **TBD** Model Number: **TBD**
2. Generator Nameplate Rating: MW
3. Incinerator Information:
   Dwell Temperature: °F
   Dwell Time: seconds
   Incinerator Afterburner Temperature: °F

B. EMISSIONS UNIT CAPACITY INFORMATION
(Regulated Emissions Units Only)

Emissions Unit Operating Capacity and Schedule

1. Maximum Heat Input Rate:			**99**	mmBtu/hr
2. Maximum Incineration Rate:	lb/hr			tons/day
3. Maximum Process or Throughput Rate:				
4. Maximum Production Rate:				
5. Requested Maximum Operating Schedule:				
	24	hours/day	**7**	days/week
	52	weeks/year	**8,760**	hours/year

6. Operating Capacity/Schedule Comment (limit to 200 characters):

Max heat input will be up to 99 MMBtu/hr, which is the maximum for both natural gas and distillate fuel oil. The actual heat input will vary depending on supplier. The boiler will be operated to supplement steam generated from the cogeneration unit and auxiliary boiler.

C. EMISSIONS UNIT REGULATIONS
(Regulated Emissions Units Only)

List of Applicable Regulations

See Attachment TB-EU1-C for operational requirements	

ATTACHMENT TB-EU1-C

APPLICABLE REQUIREMENTS LISTING

EMISSION UNIT: Temporary Steam Boiler

FDEP Rules:

Stationary Sources-General:

62-210.650	- Circumvention
62-210.700(1)	- Excess Emissions; malfunction; 2-hrs/24-hrs
62-210.700(2)	- Excess Emissions; FFFSG; startup/shutdown
62-210.700(3)	- Excess Emissions; FFFSG; soot blowing/load change
62-210.700(4)	- Excess Emissions; Excludes poor maintenance
62-210.700(6)	- Excess Emissions; reporting

Stationary Sources-Emission Monitoring:

62-297.310(1)	- Test Runs-Mass Emission
62-297.310(2)(b)	- Operating Rate
62-297.310(3)	- Calculation of Emission
62-297.310(4)(a)1.	- Applicable Test Procedures; Sampling time
62-297.310(4)(b)	- Sample Volume
62-297.310(4)(c)	- Required Flow Rate Range-PM
62-297.310(4)(d)	- Calibration
62-297.310(4)(e)	- EPA Method 5
62-297.310(5)	- Determination of Process Variables
62-297.310(6)(a)	- Permanent Test Facilities - general
62-297.310(6)(c)	- Sampling Ports
62-297.310(6)(d)	- Work Platforms
62-297.310(6)(e)	- Access
62-297.310(6)(f)	- Electrical Power
62-297.310(6)(g)	- Equipment Support
62-297.310(7)(a)1.	- Renewal
62-297.310(7)(a)3.	- Permit Renewal Test Required
62-297.310(7)(a)4.b.	- Annual Test
62-297.310(7)(a)5.	- PM exemption if < 400 hrs/yr
62-297.310(7)(a)9.	- FDEP Notification - 15 days
62-297.310(8)	- Test Reports

Stationary Sources - BACT Steam Generators < 250 mmBtu/hr

62-296.406(2)	- Particulate Matter
62-296.406(3)	- Sulfur Dioxide

Federal Rules:

NSPS General:

40 CFR 60.7(b)	- Notification and Recordkeeping (startup/shutdown/malfunction)
40 CFR 60.7(f)	- Notification and Recordkeeping (maintain records)

40 CFR 60.8(c)	- Performance Tests (representative conditions)
40 CFR 60.8(e)	- Performance Tests (test facilities required)
40 CFR 60.8(f)	- Performance Tests (test runs)
40 CFR 60.11(a)	- Compliance (ref. S.60.8 Subpart; other than opacity)
40 CFR 60.11(b)	- Compliance (opacity determined EPA Method 9)
40 CFR 60.11(c)	- Compliance (opacity; excludes startup/shutdown/malfunction)
40 CFR 60.11(d)	- Compliance (maintain air pollution control equipment)
40 CFR 60.11(f)	- Compliance (opacity; ref. S.60.8)
40 CFR 60.12	- Circumvention

NSPS Subpart Dc:

40 CFR 60.42c(d)	- SO_2 Fuel Oil Combustion Limits
40 CFR 60.42c(h)	- Fuel Oil Sulfur Content Certification
40 CFR 60.43c(c)	- Opacity Limits
40 CFR 60.43c(d)	- Opacity Limits during startup, shutdown, or malfunction
40 CFR 60.44c(g)	- Demonstration of compliance with fuel oil sulfur limits
40 CFR 60.45c(a)(7)	- Method 9 testing
40 CFR 60.46c(d)(2)	- Fuel sampling
40 CFR 60.48c(a)	- Notification requirements
40 CFR 60.48c(d)	- Report submittal
40 CFR 60.48c(e)(11)	- Fuel oil supplier certification requirements
40 CFR 60.48c(f)(1)	- Fuel oil supplier certification information
40 CFR 60.48c(g)	- Fuel combustion records

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

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram?	2. Emission Point Type Code: 1	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point): **Exhausts through a single stack.**		
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common:		
5. Discharge Type Code: V	6. Stack Height: 21 feet	7. Exit Diameter: 4 feet
8. Exit Temperature: 500 °F	9. Actual Volumetric Flow Rate: 36,000 acfm	10. Water Vapor: 8.5 %
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): **Stack parameters are typical for the type of trailer-mounted boiler.**		

E. SEGMENT (PROCESS/FUEL) INFORMATION
(All Emissions Units)

Segment Description and Rate: Segment 1 of 2

1. Segment Description (Process/Fuel Type) (limit to 500 characters): **Natural Gas < 100 MMBtu/hr**		
2. Source Classification Code (SCC): **1-02-006-02**	3. SCC Units: **Million Cubic Feet Burned**	
4. Maximum Hourly Rate: **0.097**	5. Maximum Annual Rate: **776**	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit: **1020**
10. Segment Comment (limit to 200 characters): **Maximum hourly based on 1,020 Btu/cf (HHV) for the standby boiler. Maximum annual based on 8,000 hr/yr.**		

Segment Description and Rate: Segment 2 of 2

1. Segment Description (Process/Fuel Type) (limit to 500 characters): **Distillate (No. 2) Fuel Oil**		
2. Source Classification Code (SCC): **1-02-005-02**	3. SCC Units: **1,000 Gallons Burned**	
4. Maximum Hourly Rate: **0.728**	5. Maximum Annual Rate: **1,048.3**	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur: **0.5**	8. Maximum % Ash:	9. Million Btu per SCC Unit: **136**
10. Segment Comment (limit to 200 characters): **Million Btu per SCC unit = 136; based on 6.83 lb/gal; HHV 19,910 Btu/lb, ISO conditions, maximum annual rate based on a maximum of 1,440 hours of oil firing per year.**		

F. EMISSIONS UNIT POLLUTANTS
(All Emissions Units)

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
PM			
SO_2			EL
NO_x	024		EL
CO			EL
PM_{10}			

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units - Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: **PM**	2. Total Percent Efficiency of Control:
3. Potential Emissions: **1.5** lb/hour **1.7** tons/year	4. Synthetically Limited? [X]
5. Range of Estimated Fugitive Emissions: [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year	
6. Emission Factor: Reference: **Vendor; Golder 2000.**	7. Emissions Method Code: **2**
8. Calculation of Emissions (limit to 600 characters): **See Attachment Part II.**	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): **Lb/hr based on oil firing. TPY based on the maximum possible boiler operation of 6,160 hr/yr gas firing and 1,440 hr/yr oil firing.**	

Allowable Emissions Allowable Emissions 1 of 2

1. Basis for Allowable Emissions Code: **OTHER**	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: **VE <20% opacity**	4. Equivalent Allowable Emissions: **1.5** lb/hour **1.1** tons/year
5. Method of Compliance (limit to 60 characters): **EPA Method 9**	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): **Oil firing, 1,440 hr/yr. See Attachment Part II.**	

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units - Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: **PM**	2. Total Percent Efficiency of Control:
3. Potential Emissions: **1.5** lb/hour **1.7** tons/year	4. Synthetically Limited? [**X**]
5. Range of Estimated Fugitive Emissions: [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year	
6. Emission Factor: Reference: **Vendor; Golder 2000.**	7. Emissions Method Code: **2**
8. Calculation of Emissions (limit to 600 characters): **See Attachment Part II.**	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): **Lb/hr based on oil firing. TPY based on the maximum possible boiler operation of 6,160 hr/yr gas firing and 1,440 hr/yr oil firing.**	

Allowable Emissions Allowable Emissions 2 of 2

1. Basis for Allowable Emissions Code: **OTHER**	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: **VE < 10% opacity**	4. Equivalent Allowable Emissions: **0.2** lb/hour **0.8** tons/year
5. Method of Compliance (limit to 60 characters): **EPA Method 9**	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): **Gas Firing; 8,000 hr/yr. See Attachment Part II.**	

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units - Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: **SO_2**	2. Total Percent Efficiency of Control:
3. Potential Emissions: **29.7** lb/hour **22.3** tons/year	4. Synthetically Limited? [X]
5. Range of Estimated Fugitive Emissions: [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year	
6. Emission Factor: Reference: **Vendor; Golder 2000.**	7. Emissions Method Code: **2**
8. Calculation of Emissions (limit to 600 characters): **See Attachment Part II.**	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): **Lb/hr based on oil firing. TPY based on the maximum possible boiler operation of 6,160 hr/yr gas firing and 1,440 hr/yr oil firing.**	

Allowable Emissions Allowable Emissions **1** of **2**

1. Basis for Allowable Emissions Code: **OTHER**	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: **0.5% Sulfur Oil maximum**	4. Equivalent Allowable Emissions: **29.7** lb/hour **21.4** tons/year
5. Method of Compliance (limit to 60 characters): **Fuel Sampling**	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): **Oil Firing; 1,440 hr/yr. Average sulfur content is 0.3% sulfur. See Attachment Part II.**	

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units - Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: **SO_2**	2. Total Percent Efficiency of Control:
3. Potential Emissions: **29.7** lb/hour **22.3** tons/year	4. Synthetically Limited? [X]
5. Range of Estimated Fugitive Emissions: [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year	
6. Emission Factor: Reference: **Vendor; Golder 2000.**	7. Emissions Method Code: **2**
8. Calculation of Emissions (limit to 600 characters): **See Attachment Part II.**	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): **Lb/hr based on oil firing. TPY based on the maximum possible boiler operation of 6,160 hr/yr gas firing and 1,440 hr/yr oil firing.**	

Allowable Emissions Allowable Emissions 2 of 2

1. Basis for Allowable Emissions Code: **OTHER**	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: **See Comment**	4. Equivalent Allowable Emissions: **0.3** lb/hour **1.2** tons/year
5. Method of Compliance (limit to 60 characters): **Pipeline Natural Gas**	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): **Pipeline natural gas, 1 g/100 cf, 8,000 hr/yr, See Attachment Part II.**	

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units - Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: **NO_X**	2. Total Percent Efficiency of Control:
3. Potential Emissions: **12.9** lb/hour **39.8** tons/year	4. Synthetically Limited? [X]
5. Range of Estimated Fugitive Emissions: [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year	
6. Emission Factor: Reference: **Vendor; Golder 2000.**	7. Emissions Method Code: **2**
8. Calculation of Emissions (limit to 600 characters): **See Attachment Part II.**	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): **Lb/hr based on oil firing. TPY based on the maximum possible boiler operation of 6,160 hr/yr gas firing and 1,440 hr/yr oil firing.**	

Allowable Emissions Allowable Emissions 1 of 2

1. Basis for Allowable Emissions Code: **OTHER**	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: **0.13 lb/MMBtu**	4. Equivalent Allowable Emissions: **12.9** lb/hour **9.3** tons/year
5. Method of Compliance (limit to 60 characters): **Manufacturer Certification**	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): **Annual Allowable Emissions based on 1,440 hr/yr. See Attachment Part II.**	

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units - Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: **NO_X**	2. Total Percent Efficiency of Control:

3. Potential Emissions: **12.9** lb/hour **39.8** tons/year	4. Synthetically Limited? [X]
5. Range of Estimated Fugitive Emissions: [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year	
6. Emission Factor: Reference: **Vendor; Golder 2000.**	7. Emissions Method Code: **2**

8. Calculation of Emissions (limit to 600 characters):

See Attachment Part II.

9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):

Lb/hr based on oil firing. TPY based on the maximum possible boiler operation of 6,160 hr/yr gas firing and 1,440 hr/yr oil firing.

Allowable Emissions Allowable Emissions 2 of 2

1. Basis for Allowable Emissions Code: **OTHER**	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: **0.1 lb/MMBtu**	4. Equivalent Allowable Emissions: **9.9** lb/hour **39.6** tons/year

5. Method of Compliance (limit to 60 characters):

Manufacturer Certification

6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):

Annual Allowable Emissions based on 8,000 hr/yr. See Attachment Part II.

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units - Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: **CO**	2. Total Percent Efficiency of Control:
3. Potential Emissions: **14.9** lb/hour **59.4** tons/year	4. Synthetically Limited? [**X**]
5. Range of Estimated Fugitive Emissions: [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year	
6. Emission Factor: Reference:	7. Emissions Method Code: **2**
8. Calculation of Emissions (limit to 600 characters): **See Attachment Part II.**	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): **Lb/hr based on oil firing. TPY based on the maximum possible boiler operation of 8,000 hr/yr gas firing.**	

Allowable Emissions Allowable Emissions 1 of 2

1. Basis for Allowable Emissions Code: **OTHER**	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: **0.15 lb/MMBtu**	4. Equivalent Allowable Emissions: **14.9** lb/hour **10.7** tons/year
5. Method of Compliance (limit to 60 characters): **Manufacturer Certification**	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): **Oil firing for 1,440 hr/yr. See Attachment Part II.**	

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units - Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: **CO**	2. Total Percent Efficiency of Control:
3. Potential Emissions: **14.9** lb/hour **59.4** tons/year	4. Synthetically Limited? [**X**]
5. Range of Estimated Fugitive Emissions: [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year	
6. Emission Factor: Reference:	7. Emissions Method Code: **2**
8. Calculation of Emissions (limit to 600 characters): **See Attachment Part II.**	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): **Lb/hr based on oil firing. TPY based on the maximum possible boiler operation of 8,000 hr/yr gas firing.**	

Allowable Emissions Allowable Emissions 2 of 2

1. Basis for Allowable Emissions Code: **OTHER**	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: **0.15 lb/MMBtu**	4. Equivalent Allowable Emissions: **14.9** lb/hour **59.4** tons/year
5. Method of Compliance (limit to 60 characters): **Manufacturer Certification**	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): **Based on 8,000 hr/yr gas firing. See Attachment Part II.**	

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units - Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: **PM_{10}**	2. Total Percent Efficiency of Control:
3. Potential Emissions: **1.5** lb/hour **1.7** tons/year	4. Synthetically Limited? [**X**]
5. Range of Estimated Fugitive Emissions: [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year	
6. Emission Factor: Reference: **Vendor; Golder 2000.**	7. Emissions Method Code: **2**
8. Calculation of Emissions (limit to 600 characters): **See Attachment Part II.**	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): **Lb/hr based on oil firing. TPY based on the maximum possible boiler operation of 6,160 hr/yr gas firing and 1,440 hr/yr oil firing.**	

Allowable Emissions Allowable Emissions 1 of 2

1. Basis for Allowable Emissions Code: **OTHER**	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: **VE < 20% opacity**	4. Equivalent Allowable Emissions: **1.5** lb/hour **1.1** tons/year
5. Method of Compliance (limit to 60 characters): **EPA Method 9**	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): **Oil firing, 1,440 hr/yr. See Attachment Part II.**	

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units - Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: **PM_{10}**	2. Total Percent Efficiency of Control:
3. Potential Emissions: **1.5** lb/hour **1.7** tons/year	4. Synthetically Limited? [X]
5. Range of Estimated Fugitive Emissions: [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year	
6. Emission Factor: Reference: **Vendor; Golder 2000.**	7. Emissions Method Code: **2**
8. Calculation of Emissions (limit to 600 characters): **See Attachment Part II.**	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): **Lb/hr based on oil firing. TPY based on the maximum possible boiler operation of 6,160 hr/yr gas firing and 1,440 hr/yr oil firing.**	

Allowable Emissions Allowable Emissions 2 of 2

1. Basis for Allowable Emissions Code: **OTHER**	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: **VE < 10% opacity**	4. Equivalent Allowable Emissions: **0.2** lb/hour **0.8** tons/year
5. Method of Compliance (limit to 60 characters): **EPA Method 9**	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): **Gas firing; 8,000 hr/yr. See Attachment Part II.**	

H. VISIBLE EMISSIONS INFORMATION
(Only Regulated Emissions Units Subject to a VE Limitation)

Visible Emissions Limitation: Visible Emissions Limitation 1 of 1

1. Visible Emissions Subtype: **VE20**	2. Basis for Allowable Opacity: [X] Rule [ ] Other
3. Requested Allowable Opacity: Normal Conditions: **20** % Exceptional Conditions: **100** % Maximum Period of Excess Opacity Allowed: **60** min/hour	
4. Method of Compliance: **Annual VE Test EPA Method 9**	
5. Visible Emissions Comment (limit to 200 characters): **VE of 20% proposed for distillate oil firing. VE of 10% proposed for gas firing. Excess opacity based on Rule 62-210.700.**	

I. CONTINUOUS MONITOR INFORMATION
(Only Regulated Emissions Units Subject to Continuous Monitoring)

Continuous Monitoring System: Continuous Monitor _____ of _____

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	[ ] Rule [ ] 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):	

J. EMISSIONS UNIT SUPPLEMENTAL INFORMATION
(Regulated Emissions Units Only)

Supplemental Requirements

1. Process Flow Diagram [ ] Attached, Document ID: _____ [X] Not Applicable [ ] Waiver Requested
2. Fuel Analysis or Specification [ ] Attached, Document ID: _____ [X] Not Applicable [ ] Waiver Requested
3. Detailed Description of Control Equipment [ ] Attached, Document ID: _____ [X] Not Applicable [ ] Waiver Requested
4. Description of Stack Sampling Facilities [ ] Attached, Document ID: _____ [X] Not Applicable [ ] Waiver Requested
5. Compliance Test Report [ ] Attached, Document ID: _____ [ ] Previously submitted, Date: _____ [X] Not Applicable
6. Procedures for Startup and Shutdown [ ] Attached, Document ID: _____ [X] Not Applicable [ ] Waiver Requested
7. Operation and Maintenance Plan [ ] Attached, Document ID: _____ [X] Not Applicable [ ] Waiver Requested
8. Supplemental Information for Construction Permit Application [X] Attached, Document ID: Part II [ ] Not Applicable
9. Other Information Required by Rule or Statute [ ] Attached, Document ID: _____ [X] Not Applicable
10. Supplemental Requirements Comment:

Additional Supplemental Requirements for Title V Air Operation Permit Applications

11. Alternative Methods of Operation
[ ] Attached, Document ID:_____ [ ] Not Applicable

12. Alternative Modes of Operation (Emissions Trading)
[ ] Attached, Document ID:_____ [ ] Not Applicable

13. Identification of Additional Applicable Requirements
[ ] Attached, Document ID:_____ [ ] Not Applicable

14. Compliance Assurance Monitoring Plan
[ ] Attached, Document ID:_____ [ ] Not Applicable

15. Acid Rain Part Application (Hard-copy Required)

[ ] Acid Rain Part - Phase II (Form No. 62-210.900(1)(a))
Attached, Document ID:_____

[ ] Repowering Extension Plan (Form No. 62-210.900(1)(a)1.)
Attached, Document ID:_____

[ ] New Unit Exemption (Form No. 62-210.900(1)(a)2.)
Attached, Document ID:_____

[ ] Retired Unit Exemption (Form No. 62-210.900(1)(a)3.)
Attached, Document ID:_____

[ ] Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.)
Attached, Document ID:_____

[ ] Phase NOx Averaging Plan (Form No. 62-210.900(1)(a)5.)
Attached, Document ID:_____

[ ] Not Applicable

PART II

SUPPORTING INFORMATION

1.0 INTRODUCTION

Tropicana Products, Inc. is proposing to install and operate one standby steam boiler at the existing Bradenton Citrus Processing Plant. The steam boiler will operate to supplement steam generated by the existing auxiliary boiler and combined cycle combustion turbine. The standby boiler will be operated when either of the existing steam sources are at reduced operating loads or not operating. The boiler will be a trailer-mounted boiler that will be rented as necessary to provide supplemental steam. The standby boiler will be fired primarily with pipeline quality natural gas and distillate fuel oil will be used as a backup.

1.1 EXISTING FACILITY AND PROPOSED STANDBY STEAM BOILER

The Tropicana facility is located at 1001 13th Avenue East, Bradenton, Florida. The existing industrial complex includes glass manufacturing, and citrus processing that includes juice extracting, processing, packaging, warehousing, and distribution. Fruit is graded and carried to an extractor room where the juice is removed and pumped to either carton filling, glass filling, plastic filling, block freezing, aseptic storage or to evaporators for concentrate production.

The plant contains three citrus feed mills, four citrus pellet mills (including two pellet coolers and associated pellet, bulk cooling reels, and Ross coolers), two glass plants, cogeneration facility (combustion turbine, heat recovery steam generator (HRSG), duct burner, auxiliary boiler, sanitary process steam boiler (used to produce 5-fold citrus oil), and a wastewater treatment system that includes a package steam boiler and an anaerobic reactor with a biogass flare.

The proposed standby steam boiler will be rented on a temporary basis as needed for supplying steam to supplement or replace the steam generated by the auxiliary boiler and cogeneration unit. The standby boiler will have a nominal steam rating of 70,000 pounds (lb) of steam per hour. A maximum heat input of 99 million British thermal units per hour (MMBtu/hr) is proposed to envelope the possible boilers that can be rented. The fuel will be primarily pipeline-quality natural gas with No. 2 fuel oil as a backup fuel. The fuel oil will contain a maximum of 0.5 percent sulfur and an average of 0.3 percent sulfur.

1.2 STANDBY STEAM BOILER EMISSION ESTIMATION

The estimated hourly and annual criteria pollutant emissions from the standby steam boiler are provided in Table 1. The boiler emissions are based on a total heat input rate of 99.0 MMBtu/hr and a total fuel usage rate of 97,059 standard cubic feet per hour of pipeline quality natural gas or 728 gallons per hour of No. 2 fuel oil with 0.05-percent sulfur. Actual hourly emissions are expected to be lower since the capacity of the boilers available for this purpose have a heat input rate of less than 99 mmBtu/hr.

The standby boiler emissions are based on 8,000 hours per year of operation when firing natural gas. Up to 1,440 hours per year (60 days) of distillate fuel oil firing is being proposed as the back-up fuel requirements. Specific vendor information for the standby steam boiler is provided in Attachment A.

The operation of the boiler is proposed to be limited by the equivalent heat input of operating 8,000 hr/yr on natural gas of 792,000 mmBtu/yr (99 mmBtu/hr times 8,000 hr/yr). Distillate oil usage is proposed as a backup fuel up to an equivalent of 1,440 hr/yr or 142,560 mmBtu/yr (99 mmBtu/hr times 1,440 hr/yr). In the event distillate oil is burned, the maximum amount of gas authorized would be decreased by a factor of 1.3. For example, if 50,000 mmBtu/yr of distillate oil were burned, then the annual amount of gas authorized would decrease by 65,000 mmBtu/yr (1.3 times 50,000 mmBtu/yr). This schedule is being proposed to make the NO_x emissions equivalent and less than 40 TPY (i.e., the PSD Threshold; see Section 1.3).

1.3 APPLICABLE REQUIREMENTS AND PERMITTING CONDITIONS

A modification is defined in Rule 62-210.200 Florida Administrative Code (F.A.C.) as any physical change in, or a change in the method of operation of, or addition to a facility which would result in an increase in the actual emissions of any air pollutant subject to regulation under the Clean Air Act. A modification to a major source of air pollution, such as the Tropicana Bradenton Citrus Processing Plant, may be subject to review under the

Department's Prevention of Significant Deterioration (PSD) rules codified in Rule 62-212.400 F.A.C.

The proposed fuel use limitations will limit the potential emission rates for the standby steam boiler to be less than the PSD significant emission rates in Table 62-212.400-2 in Rule 62-212.400 F.A.C. Therefore, PSD review would not apply. The Tropicana Bradenton facility will record the fuel use and hours of operation for the standby boiler to demonstrate compliance.

The standby boiler will also be subject to specific standards in 62-296.406, F.A.C., applicable to fossil fuel steam generators with less than 250 MMBtu/hr heat input. The maximum heat input rate of the proposed standby steam boiler is 99 MMBtu/hr and therefore will be subject to this rule. F.A.C. 62-296.406(1) requires that visible emissions from the standby boiler will be limited to 20-percent opacity, except for either one 6-minute period per hour during which opacity shall not exceed 27 percent, or one 2-minute period per hour during which opacity shall not exceed 40 percent. Method 9 will be used demonstrate compliance with the opacity limits on an annual basis. Rules 62-296.406(2) and (3) require that best achievable control technology (BACT) for PM and SO_2 be applied to the standby steam boiler. The BACT requirements and analysis are presented in Section 2.0.

The standby steam boiler will be subject to 40 CFR 60, Subpart Dc, *New Source Performance Standards for Small Industrial-Commercial-Institutional Steam Generating Units*. According to the rule, a boiler less than 100 MMBtu/hr may emit no more than 0.5 pounds/MMBtu of SO_2, or as an alternative, must burn fuel oil with a maximum sulfur content of 0.50 percent. In addition, the boiler will be subject to a 20-percent opacity limitation, except up to 6 minutes per hour, the opacity must not exceed 27 percent. The standby boiler will comply with these requirements by testing the fuel oil sulfur content and performing an annual Method 9 test for opacity.

2.0 BACT ANALYSIS

2.1 REQUIREMENTS

The control technology review requirements of the state regulations require that all applicable state emissions-limiting standards are met, and that BACT be applied to control emissions from the source. Rule 62-296.406, F.A.C., requires BACT for PM and SO_2. BACT is defined in Rule 62-210.200(42) as:

> An emission limitation, including a visible emissions standard, based on the maximum degree of reduction of each pollutant emitted which the Department, 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 (including fuel cleaning or treatment or innovative fuel combustion techniques) for control of each such pollutant. If the Department determines that technological or economic limitations on the application of measurement methodology to a particular part of an emissions unit or facility would make the imposition of an emission standard infeasible, a design, equipment, work practice, operational standard or combination thereof, may be prescribed instead to satisfy the requirement for the application of BACT. Such standard shall, to the degree possible, set forth the emissions reductions achievable by implementation of such design, equipment, work practice or operation.

The BACT requirements are intended to ensure that the control systems incorporated in the design of a proposed facility reflect the latest in control technologies used in that particular industry and take into consideration existing and future air quality in the vicinity of the proposed facility. BACT must, as a minimum, demonstrate compliance with NSPS for a source (if applicable). An evaluation of the air pollution control techniques and systems, including a cost-benefit analysis of alternative control technologies capable of achieving a higher degree of emission reduction than the proposed control technology, is required. The cost-benefit analysis requires the documentation of the materials, energy, and economic penalties associated with the proposed and alternative control systems, as well as the environmental benefits derived from these systems. A decision on BACT is to be based on sound judgement, balancing environmental benefits with energy, economic, and other impacts (EPA, 1978).

2.2 PROPOSED BACT FOR SO_2

There are no technically feasible methods for controlling the emissions of SO_2 from small steam boilers other than the inherent quality of the fuel. Therefore, the proposed BACT for SO_2 emissions from the standby steam boiler will be based on burning pipeline quality natural gas and very low sulfur fuel oil. Tropicana Bradenton will use pipeline quality natural gas as the primary fuel with a sulfur content of 1 grain per 100 cubic feet. Distillate fuel oil will be used as a backup fuel with a maximum sulfur content of 0.5 percent, which is currently authorized for the auxiliary boiler.

2.3 PROPOSED BACT FOR PM

PM emissions from the standby steam boiler are estimated to be less than 2 TPY. Due to the low emissions, no control equipment is recommended for PM. The proposed BACT is to use No. 2 fuel oil with a maximum sulfur content of 0.5 percent. It is proposed that no further particulate controls are necessary for the proposed standby boiler.

Table 1. Stand-By Boiler Criteria Emissions (nominal 70,000 lb/hr steam)

	Gas Firing		Oil Firing		Maximum Tons per year[b]	
	(lb/MMBtu)[a]	(lb/hr)	(lb/MMBtu)[a]	(lb/hr)	(Case A)	(Case B)
PM as TSP	0.002	0.20	0.015	1.49	0.79	1.68
PM10	0.002	0.20	0.015	1.49	0.79	1.68
NO_x	0.1	9.90	0.13	12.87	39.60	39.76
SO2	0.003	0.30	0.3	29.70	1.19	22.30
CO	0.15	14.85	0.15	14.85	59.40	56.43
VOCs	0.004	0.40	0.004	0.40	1.58	1.50

Heat Input:

Gas (MMBtu/hr) = 99 MMBtu/hr - Gas

Oil (MMBtu/hr) = 99 MMBtu/hr - Oil

[a] Vendor provided values

[b] Maximim emission cases:

	Number of Hours for Operation	
Operation	Gas Only	Gas and Oil
100 % Load - Gas	8,000	6,160
100 % Load - Oil	0	1,440
Total hours	8,000	7,600

ATTACHMENT A

MANUFACTURER INFORMATION FOR THE STANDBY STEAM BOILER (EXAMPLE OF TYPICAL TRAILER-MOUNTED BOILER)

Indeck Power Equipment Company
1111 S. Willis Avenue
Wheeling, IL 60090

To:	**Steve Maltby**
Company:	**Golder Ass.**
Phone:	**352-336-5600**
Fax:	**352-336-6603**
From:	**John P. Sullivan**
Title:	**National Sales Engineer**
Phone:	**(847) 541-8300**
Fax:	**(847) 541-9984**
E-Mail:	jsullivan45@compuserve.com
Date:	**10/25/00**
Total Pages Sent:	**1**

RE: 70,000 PPH Rental Boiler Emissions

RE: INDECK QUOTE DATED 8/9/00

NATURAL GAS :		**NO. 2 OIL:**	
NOX:	84 PPM	NOX:	101 PPM
CO:	200 PPM	CO:	200 PPM
PARTICULATE:	.01 LBS/MM/BTU	PARTICULATE:	.05 LBS/MM/BTU
VOC:	.004 LBS/MM/BTU	VOC:	.004 LBS/MM/BTU
SO2:	.003 LBS/MM/BTU	SO2	.164 LBS/MM/BTU
SOX:	.001 LBS/MM/BTU	SOX:	.151 LBS/MM/BTU

INDECK POWER EQUIPMENT COMPANY • 1111 SOUTH WILLIS AVENUE • WHEELING, ILLINOIS 60090-5841
847/541-8300 • TELEX 28-3544 • FAX 847/541-9984

INDECK®

August 9, 2000

Facsimile No. 941-742-2900
Tropicana
1001 – 13th Avenue East
Bradenton, Florida 34208

Attention: Mr. Tom Williams
Phone: 941-742-2740

Reference: Telephone Conversation of August 9, 2000

Subject: Rental Boiler

Dear Mr. Williams:

In accordance with your request, I am pleased to provide the following for your review and consideration.

70,000 PPH Trailer Mounted Boiler

One (1) 70,000 lb./hr. Indeck trailer mounted steam system, designed and built to the ASME Power Boiler Code for 350 psig design pressure with an operating pressure range of 125-335 psig. The unit is arranged to fire either natural gas requiring regulated gas pressure of 10 psig at the trailer connection or #2 fuel oil with either fuel requiring a gas pilot. The unit is complete with the manufacturer's standard trim, Low NOx burner, electric single point positioning combustion controls, Industrial Risk Insurance (IRI) approved fuel trains, automatic relay type non-recycling burner management system and a forced draft fan, coupled to a 75 HP, TEFC drive motor requiring 480 volts, 3-phase, 60 Hertz power. The following list of auxiliary equipment is shipped loose on the trailer for field mounting by others.,

a. 6 ft. high stack & transition assembly.
b. 8" - 300 psig flanged steam non-return valve.
c. ASME safety relief valves set at 350 psig.
d. Bottom drum tandem blowdown valves.
e. Flanged upper forced draft fan housing.

The above 70,000 lb./hr. steam boiler is mounted on a 52 ft. long specially designed trailer.

Your net price for the above described trailer mounted boiler system is $24,000.00/month, f.o.b. Wheeling, Illinois.

Estimated freight charges to Bradenton, Florida and return are $4,400.00 each way.

The above mobile steam system is currently in-stock and available for shipment. All equipment is offered subject to prior rental/sale.

After the equipment has been properly installed by others and is ready for operation, we do require that an Indeck Service Technician supervise the initial start-up by your operators and train your operating personnel. This service will be billed at $750.00/8 hour day (straight time) plus travel and expenses for the Engineer on a portal to portal basis. Expenses will be billed at cost plus 15% supported by third party receipts.

WARRANTY

After start-up, should any failures of the following types occur, they will be repaired at **no cost** to you.

Bearings	Refractory
Blowers	Safety Valves
Controls	Tubes
Electric Motors	Valves
Gauges	Water Columns
Leaking Gaskets	Wiring

The above guarantee includes all parts and labor and extends throughout the entire rental period.

Also, a full rental credit will be allowed for all down days.

Users are responsible for:

A. Returning defective part(s) within 30 days of shipment of warranty part(s).
B. Indeck Power Equipment Company requires that ABMA guidelines are maintained within the steam drum of our boilers.
C. Proper care and maintenance of the equipment
D. Providing competent operators

INDECK

August 9, 2000

E. A temporary shelter to protect the burner and controls from the environment. The shelter must be substantial enough to protect from rain and freezing temperatures. If necessary, a heater needs to be supplied to keep the burner and controls above 32 Deg. Some areas of the country may require a complete shelter depending upon your location.

Please note that the above quoted prices do not include any taxes, permits, fees, duties, etc.

I have enclosed a customer connection drawing and specifics on the unit quoted herein for your review.

Thank you for the opportunity of quoting our equipment and after review of the above, should you have any questions or require additional information, please feel free to contact me at your convenience.

Very truly yours,

INDECK POWER EQUIPMENT COMPANY

John P. Sullivan
Sales Engineer

JPS/mg
Enclosures

70,000 PPH Rental Boiler Specifications

General Information:
One (1) 70,000 PPH trailer mounted watertube steam boiler, designed to the ASME Code for 350 psig design pressure, arranged for natural gas or #2 oil firing, complete with manufacturer's standard boiler trim, Low NO_x burner, and combustion controls.

Boiler Information:	
Design Pressure	350 PSI
Maximum Operating Pressure	325 PSI
Minimum Operating Pressure	125 PSI
Gas Fired Requirements:	
Gas Consumption (100%)	88,435 SCFH
Gas Pressure Required at Connection	
Must be Regulated to	10-12 PSI
Electrical Amps on Gas Firing	110
Emissions Information	Upon Request
Low NO_x Burner	All Units
Oil Fired Requirements :(#2 Oil Only)	
Oil Consumption (100%)	606 GPH
Minimum Oil Pressure At Connection	Positive
Maximum Oil Pressure At Connection	30 PSI
Pilot Gas Pressure Required for Oil Start-up	2.0 PSI
Oil Atomization (Air)	
Minimum Air Pressure	80 PSI
Maximum Air Pressure	120 PSI
Air Consumption	35 SCFM
Min. Capacity Req'd for Steam Atomization	25%
Oil Atomization (Steam) - Steam Pressure Required	125 PSI
Electrical Amps on Oil Firing	125
Emissions Information	Upon Request with Supplied Fuel Analysis
Low NO_x Burner	All Units
Feedwater Requirements:	
Minimum Feedwater Pressure	60-75 PSI Above Operating Pressure
Maximum Feedwater Pressure	100 PSI Above Operating Pressure
Minimum Feedwater Temperature	240 Deg. F.
Electrical Requirements - Single Point Connection:	
Electrical Amps- Gas Fired	110
Electrical Amps- Oil Fired	125
F.D. Fan	75 HP
Oil Pump (#2 Oil Only)	2 HP
Voltage	480V/3-Phase
Motor Starter	Included
Transformer (480 to 120)	Included
Instrument Quality Compressed Air Required for Feedwater Control Valve:	
Minimum Air Pressure	50 PSI
Maximum Air Pressure	120 PSI

Auxiliary Equipment to be Field Mounted by Others:

(1) 6 ft. high stack and transition assembly.
(1) 8" - 300 psig flanged steam non-return valve.
(2) Bottom drum tandem blowdown valves.
(2) ASME safety relief valves set at 350 psi.
(1) Flanged upper forced draft fan housing.

Dimensional Information:	
Trailer Width	10' - 6"
Trailer Length	52 Ft.
Shipping Weight	89,750 lbs.
Operating Weight	107,350 lbs.
Stack Diameter	48"

INDECK

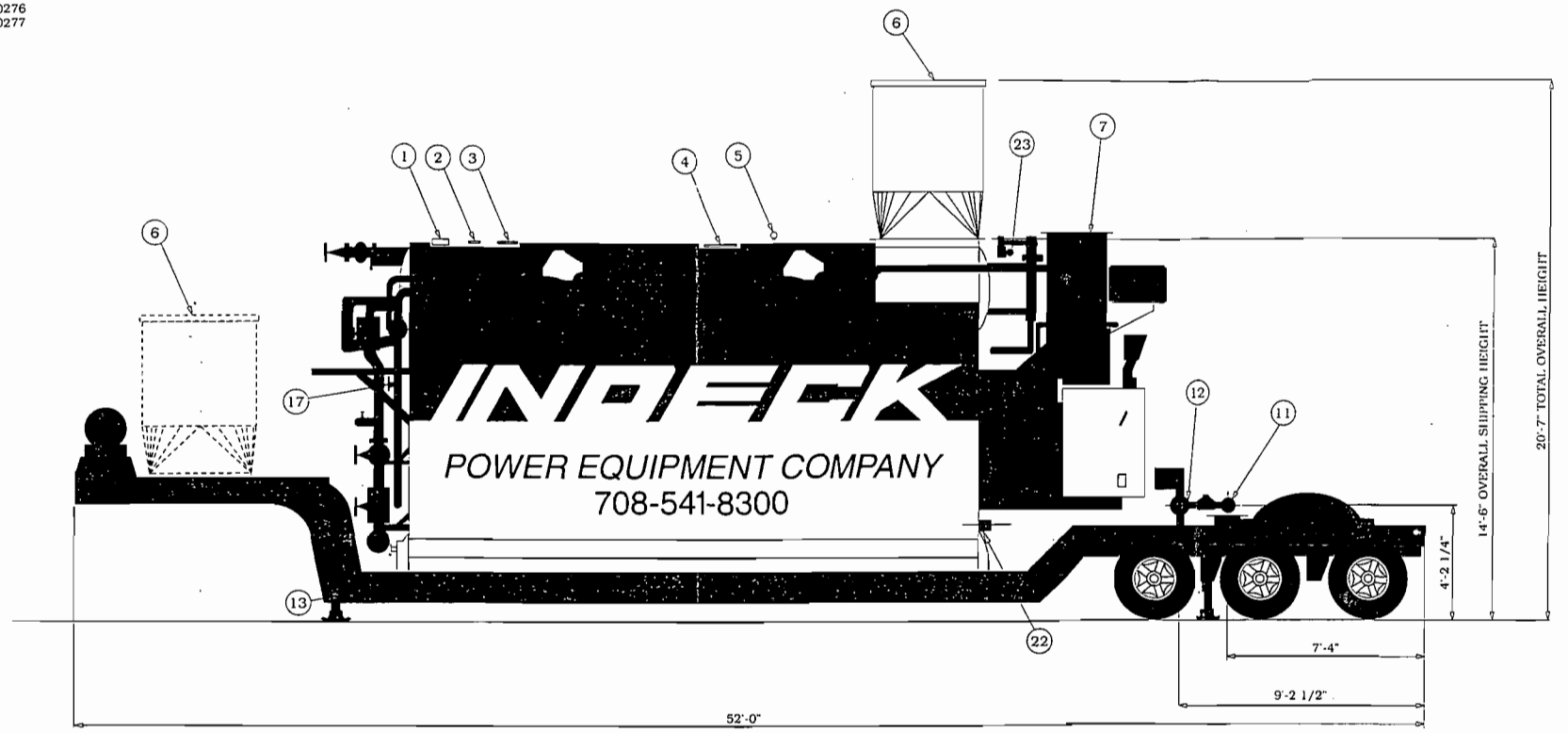
INDECK POWER EQUIPMENT CO.
1111 S. Willis Avenue
Wheeling, Illinois 60090
(708) 541-8300
(800) 446-3325
FAX: (708) 541-9984

For further information, see customer connection drawing or contact Indeck at 1-708-541-8300.

UNIT REFERENCE:

87L 14-10272
88L 14-10273
89L 14-10274
90L 14-10275
91L 14-10276
92L 14-10277

70,000 PPH RENTAL BOILER



INSTALLATION SERVICE CONNECTIONS

1. 3"-300# SAFETY VALVE CONNECTION (SAFETY VALVE MUST BE REMOVED FOR TRANSPORT)
2. 3"-300# SAFETY VALVE CONNECTION (SAFETY VALVE MUST BE REMOVED FOR TRANSPORT)
3. 3"-300# SAFETY VALVE CONNECTION (SAFETY VALVE MUST BE REMOVED FOR TRANSPORT) (& FOR LOW PRESSURE OPERATION ONLY)
4. 8"-300 # MAIN STEAM OUTLET CONNECTION
5. 1" NPT DRUM VENT / AUX CONNECTION
6. FLUE GAS STACK AND TRANSITION (REMOVED FOR TRANSPORT)
7. UPPER F.D. FAN HOUSING (REMOVABLE TO PROVIDE ADDITIONAL SHIPPING CLEARANCE (FLANGED))
8. 1 1/2"-300# AUX ATOMIZING AIR / STEAM CONNECTION (LOCATED BEHIND CABINET)
9. 1/2" NPT PILOT GAS CONNECTIONS (NAT OR PROPANE) (LOCATED BEHIND CABINET)
10. 3/4" NPT FUEL OIL RETURN CONNECTION (LOCATED ON OPPOSITE SIDE OF TRAILER)
11. 1-1/2"-NPT FUEL OIL SUPPLY CONNECTION (LOCATED ON OPPOSITE SIDE OF TRAILER)
12. 4"-150 # FUEL GAS CONNECTION
13. 1-1/2"-300 # BLOW OFF CONNECTION
14. 1-1/2"-300 # LOWER DRUM HEATING COIL CONNECTIONS
15. 3/4" NPT CHEMICAL FEED CONNECTION
16. 1" CONTINUOUS BLOWDOWN CONNECTION (LOCATED ON OPPOSITE SIDE OF TRAILER)
17. 2-1/2"-300 # FEEDWATER SUPPLY CONNECTION
18. 460/60/3 POWER SUPPLY 150 AMPS
19. 3"-300# SOOT BLOWER STEAM SUPPLY CONNECTION
20. 2"-300# CHEMICAL CLEANING CONNECTION
21. 1" NPT FURNACE PRESS CONNECTION
22. WASHOUT
23. 1/4" NPT INSTRUMENT AIR CONNECTION

DESIGN DATA

OVERALL LENGTH:	52'-0"
OVERALL WIDTH:	10'-6"
NET WEIGHT (INCL TRAILER):	89,750 LBS
CONTINUOUS CAPACITY:	70,000 PPH
DESIGN PRESSURE:	350 PSIG
FEEDWATER TEMPERATURE:	220 DEG F
FURNACE VOLUME:	854 CU. FT.
CONVECTION HEATING SURFACE:	3647 SQ. FT.
RADIANT HEATING SURFACE:	620 SQ. FT.
TOTAL HEATING SURFACE:	4267 SQ. FT. (A.S.M.E.)
GAS SUPPLY PRESSURE	10 PSIG (REGULATED BY CUSTOMER)
OIL SUPPLY PRESSURE	30 PSIG FLOODED MAX.
FEED WATER PRESSURE	75-100 PSIG ABOVE OPERATING PRESSURE
INSTRUMENT AIR PRESSURE	50 PSIG MIN.

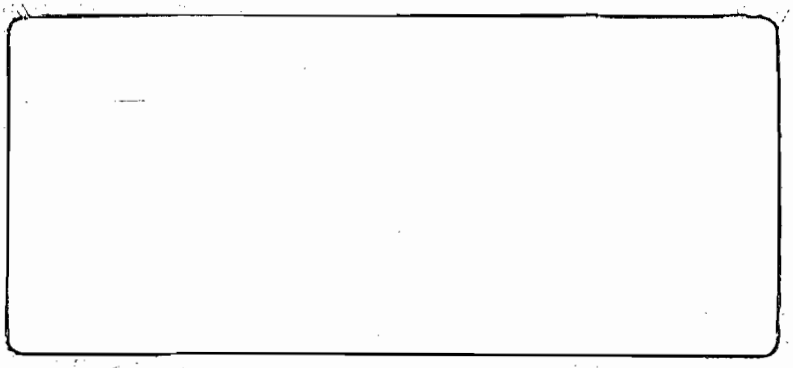
NOTE 1: A NATURAL GAS OR PROPANE PILOT IS REQUIRED FOR OIL

NOTE 2: PROVIDE ADEQUATE WEATHER PROTECTION FOR BURNER, CONTROLS AND PERSONNEL

C.F. NO. TRAILER\70-350

INDECK 70,000 PPH RENTAL BOILER

INDECK POWER EQUIPMENT COMPANY 1111 WILLIS AVENUE WHEELING, ILLINOIS 60090



Golder Associates

APPLICATION FOR AIR PERMIT
INSTALLATION OF A STANDBY
BOILER FOR TROPICANA PRODUCTS, INC.
BRADENTON CITRUS PROCESSING FACILITY

Prepared For:

Tropicana Products, Inc.
Bradenton Citrus Processing Plant
1001 13th Avenue, East
Bradenton, Manatee 34208

Prepared By:

Golder Associates Inc.
6241 NW 23rd Street, Suite 500
Gainesville, Florida 32653-1500

December 2001
9837588Y/F2

DISTRIBUTION:
4 Copies - FDEP
2 Copies - Tropicana Products, Inc.
1 Copy - Golder Associates Inc.

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LIST OF ATTACHMENTS

ATTACHMENT A TYPICAL MANUFACTURER INFORMATION FOR THE STANDBY STEAM BOILER

PART I

APPLICATION FOR AIR PERMIT
LONG FORM

Department of Environmental Protection

Division of Air Resources Management

APPLICATION FOR AIR PERMIT - TITLE V SOURCE

See Instructions for Form No. 62-210.900(1)

I. APPLICATION INFORMATION

Identification of Facility

1. Facility Owner/Company Name: **Tropicana Products, Inc.**	
2. Site Name: **Bradenton Citrus Processing Facility**	
3. Facility Identification Number: **0810007** [ ] Unknown	
4. Facility Location: Street Address or Other Locator: **1001 13th Avenue** City: **Bradenton** County: **Manatee** Zip Code: **34208**	
5. Relocatable Facility? [ ] Yes [**X**] No	6. Existing Permitted Facility? [**X**] Yes [ ] No

Application Contact

1. Name and Title of Application Contact: **Douglas E. Foster, Manager, Environmental Affairs**
2. Application Contact Mailing Address: Organization/Firm: **Tropicana Products, Inc.** Street Address: **P.O. Box 338** City: **Bradenton** State: **FL** Zip Code: **34206**
3. Application Contact Telephone Numbers: Telephone: (**941**) **742 - 2748** Fax: (**941**) **749 - 3768**

Application Processing Information (DEP Use)

1. Date of Receipt of Application:	1-10-01
2. Permit Number:	0810007-008-AC
3. PSD Number (if applicable):	
4. Siting Number (if applicable):	

Purpose of Application

Air Operation Permit Application

This Application for Air Permit is submitted to obtain: (Check one)

[ ] Initial Title V air operation permit for an existing facility which is classified as a Title V source.

[ ] Initial Title V air operation permit 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:_____

[ ] Title V air operation permit revision to address one or more newly constructed or modified emissions units addressed in this application.

Current construction permit number:_____

Operation permit number to be revised:_____

[ ] Title V air operation permit revision or administrative correction to address one or more proposed new or modified emissions units and to be processed concurrently with the air construction permit application. (Also check Air Construction Permit Application below.)

Operation permit number to be revised/corrected:_____

[ ] Title V air operation permit revision 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 number to be revised:_____

Reason for revision:_____

Air Construction Permit Application

This Application for Air Permit is submitted to obtain: (Check one)

[X] Air construction permit to construct or modify one or more emissions units.

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

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

Owner/Authorized Representative or Responsible Official

1. Name and Title of Owner/Authorized Representative or Responsible Official:
   Donald Antenore, Vice President, Manufacturing
2. Owner/Authorized Representative or Responsible Official Mailing Address:
   Organization/Firm: **Tropicana Products, Inc.**
   Street Address: **P.O. Box 338**
   City: **Bradenton** State: **FL** Zip Code: **34206**
3. Owner/Authorized Representative or Responsible Official Telephone Numbers:
   Telephone: (**941**) **742 - 2023** Fax: (**941**) **749 - 2049**
4. Owner/Authorized Representative or Responsible Official Statement:

   I, the undersigned, am the owner or authorized representative(check here [ ], if so) or the responsible official (check here [ ], if so) 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.*

Signature Date 1/07/01

* Attach letter of authorization if not currently on file.

Professional Engineer Certification

1. Professional Engineer Name: **Kennard F. Kosky**
   Registration Number: **14996**
2. Professional Engineer Mailing Address:
   Organization/Firm: **Golder Associates Inc.**
   Street Address: **6241 NW 23rd Street, Suite 500**
   City: **Gainesville** State: **FL** Zip Code: **32653-1500**
3. Professional Engineer Telephone Numbers:
   Telephone: (**352**) **336 - 5600** Fax: (**352**) **336 - 6603**

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 (seal) Date: 1/5/01

* Attach any exception to certification statement.

Scope of Application

Emissions Unit ID	Description of Emissions Unit	Permit Type	Processing Fee
023	Standby Boiler	AC1D	

Application Processing Fee

Check one: [ ] Attached - Amount: $: _____ [X] Not Applicable

Construction/Modification Information

1. Description of Proposed Project or Alterations:

   Installation of one 70,000 lb/hr (nominal steam rating) trailer-mounted steam boiler. The boiler will be used to replace or supplement steam generated by the existing cogeneration unit (Emission Unit No. 016) and the auxiliary boiler (Emission Unit No. 015). The unit is capable of firing either natural gas or No. 2 fuel oil. The unit includes a low NO_X burner.

2. Projected or Actual Date of Commencement of Construction: **1 Feb 2001**

3. Projected Date of Completion of Construction: **1 Feb 2001**

Application Comment

The boiler will be used as a supplemental source of steam. Operation of the boiler will supplement steam generated by the cogeneration unit and auxiliary boiler. The facility holds a Title V permit and, therefore, a construction permit fee is not required pursuant to Rule 62-4.050(4)(a)2. While the emission unit will have potential emissions of less than PSD thresholds for a major modification. Therefore PSD review is not required.

II. FACILITY INFORMATION

A. GENERAL FACILITY INFORMATION

Facility Location and Type

1. Facility UTM Coordinates: Zone: **17** East (km): **561.4** North (km): **3056.5**			
2. Facility Latitude/Longitude: Latitude (DD/MM/SS): **27 / 37 / 52** Longitude (DD/MM/SS): **80 / 22 / 33**			
3. Governmental Facility Code: **0**	4. Facility Status Code: **A**	5. Facility Major Group SIC Code: **49**	6. Facility SIC(s): **4911**
7. Facility Comment (limit to 500 characters): **See Attachment Part II.**			

Facility Contact

1. Name and Title of Facility Contact: **Mr. Thomas P. Hovanec, Manager, Environmental and Safety Operations**
2. Facility Contact Mailing Address: Organization/Firm: **Tropicana Products, Inc.** Street Address: **1001 13th Street** City: **Bradenton** State: **FL** Zip Code: **34208**
3. Facility Contact Telephone Numbers: Telephone: (**941**) **742 - 2788** Fax: (**941**) **742 - 2698**

Facility Regulatory Classifications

Check all that apply:

1. [ ] Small Business Stationary Source?	[ ] Unknown
2. [X] Major Source of Pollutants Other than Hazardous Air Pollutants (HAPs)?	
3. [ ] Synthetic Minor Source of Pollutants Other than HAPs?	
4. [X] Major Source of Hazardous Air Pollutants (HAPs)?	
5. [ ] Synthetic Minor Source of HAPs?	
6. [X] One or More Emissions Units Subject to NSPS?	
7. [ ] One or More Emission Units Subject to NESHAP?	
8. [ ] Title V Source by EPA Designation?	
9. Facility Regulatory Classifications Comment (limit to 200 characters): **NSPS Subpart DC applies to the standby steam boiler**	

List of Applicable Regulations

Facility emissions covered under existing Title V permit, no additional facility or emissions unit applicable requirements as a result of the proposed change.

B. FACILITY POLLUTANTS

List of Pollutants Emitted

1. Pollutant Emitted	2. Pollutant Classif.	3. Requested Emissions Cap		4. Basis for Emissions Cap	5. Pollutant Comment
		lb/hour	tons/year		

C. FACILITY SUPPLEMENTAL INFORMATION

Supplemental Requirements

1. Area Map Showing Facility Location: [ ] Attached, Document ID: _____ [X] Not Applicable [ ] Waiver Requested
2. Facility Plot Plan: [ ] Attached, Document ID: _____ [X] Not Applicable [ ] Waiver Requested
3. Process Flow Diagram(s): [ ] Attached, Document ID: _____ [X] Not Applicable [ ] Waiver Requested
4. Precautions to Prevent Emissions of Unconfined Particulate Matter: [ ] Attached, Document ID: _____ [X] Not Applicable [ ] Waiver Requested
5. Fugitive Emissions Identification: [ ] Attached, Document ID: _____ [X] Not Applicable [ ] Waiver Requested
6. Supplemental Information for Construction Permit Application: [X] Attached, Document ID Part II [ ] Not Applicable
7. Supplemental Requirements Comment:

Additional Supplemental Requirements for Title V Air Operation Permit Applications

8. List of Proposed Insignificant Activities:
   [ ] Attached, Document ID:_____ [X] Not Applicable

9. List of Equipment/Activities Regulated under Title VI:
   [ ] Attached, Document ID:_____
   [ ] Equipment/Activities On site but Not Required to be Individually Listed
   [X] Not Applicable

10. Alternative Methods of Operation:
    [ ] Attached, Document ID:_____ [X] Not Applicable

11. Alternative Modes of Operation (Emissions Trading):
    [ ] Attached, Document ID:_____ [X] Not Applicable

12. Identification of Additional Applicable Requirements:
    [ ] Attached, Document ID:_____ [X] Not Applicable

13. Risk Management Plan Verification:
    [ ] Plan previously submitted to Chemical Emergency Preparedness and Prevention Office (CEPPO). Verification of submittal attached (Document ID:_____) or previously submitted to DEP (Date and DEP Office:_____)
    [ ] Plan to be submitted to CEPPO (Date required:_____)
    [X] Not Applicable

14. Compliance Report and Plan:
    [ ] Attached, Document ID:_____ [X] Not Applicable

15. Compliance Certification (Hard-copy Required):
    [ ] Attached, Document ID:_____ [X] Not Applicable

III. EMISSIONS UNIT INFORMATION

A separate Emissions Unit Information Section (including subsections A through J 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.

A. GENERAL EMISSIONS UNIT INFORMATION
(All Emissions Units)

Emissions Unit Description and Status

1. Type of Emissions Unit Addressed in This Section: (Check one)

[X] 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.

2. Regulated or Unregulated Emissions Unit? (Check one)

[X] 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.

3. Description of Emissions Unit Addressed in This Section (limit to 60 characters):

Standby 70,000 lb/hr (Steam) Boiler

4. Emissions Unit Identification Number: [ ] No ID
ID: [X] ID Unknown

5. Emissions Unit Status Code:	6. Initial Startup Date:	7. Emissions Unit Major Group SIC Code:	8. Acid Rain Unit?
C	**Feb-01**	**49**	[ ]

9. Emissions Unit Comment: (Limit to 500 Characters)

The standby boiler will be used as a supplementary supply of process steam. The boiler will fire natural gas and no. 2 distillate oil (backup) and is subject to 40 CFR Subpart Dc.

Emissions Unit Control Equipment

1. Control Equipment/Method Description (Limit to 200 characters per device or method):

   Low NO_X Burner - Gas/Oil

2. Control Device or Method Code(s):

Emissions Unit Details

1. Package Unit: **TBD**		
Manufacturer: **TBD**	Model Number: **TBD**	
2. Generator Nameplate Rating:	MW	
3. Incinerator Information:		
Dwell Temperature:		°F
Dwell Time:		seconds
Incinerator Afterburner Temperature:		°F

B. EMISSIONS UNIT CAPACITY INFORMATION
(Regulated Emissions Units Only)

Emissions Unit Operating Capacity and Schedule

1. Maximum Heat Input Rate:			**99**	mmBtu/hr
2. Maximum Incineration Rate:	lb/hr			tons/day
3. Maximum Process or Throughput Rate:				
4. Maximum Production Rate:				
5. Requested Maximum Operating Schedule:				
	24	hours/day	**7**	days/week
	52	weeks/year	**8,760**	hours/year

6. Operating Capacity/Schedule Comment (limit to 200 characters):

Max heat input will be up to 99 MMBtu/hr, which is the maximum for both natural gas and distillate fuel oil. The actual heat input will vary depending on supplier. The boiler will be operated to supplement steam generated from the cogeneration unit and auxiliary boiler.

C. EMISSIONS UNIT REGULATIONS
(Regulated Emissions Units Only)

List of Applicable Regulations

See Attachment TB-EU1-C for operational requirements	

ATTACHMENT TB-EU1-C

APPLICABLE REQUIREMENTS LISTING

EMISSION UNIT: Temporary Steam Boiler

FDEP Rules:

Stationary Sources-General:

62-210.650	- Circumvention
62-210.700(1)	- Excess Emissions; malfunction; 2-hrs/24-hrs
62-210.700(2)	- Excess Emissions; FFFSG; startup/shutdown
62-210.700(3)	- Excess Emissions; FFFSG; soot blowing/load change
62-210.700(4)	- Excess Emissions; Excludes poor maintenance
62-210.700(6)	- Excess Emissions; reporting

Stationary Sources-Emission Monitoring:

62-297.310(1)	- Test Runs-Mass Emission
62-297.310(2)(b)	- Operating Rate
62-297.310(3)	- Calculation of Emission
62-297.310(4)(a)1.	- Applicable Test Procedures; Sampling time
62-297.310(4)(b)	- Sample Volume
62-297.310(4)(c)	- Required Flow Rate Range-PM
62-297.310(4)(d)	- Calibration
62-297.310(4)(e)	- EPA Method 5
62-297.310(5)	- Determination of Process Variables
62-297.310(6)(a)	- Permanent Test Facilities - general
62-297.310(6)(c)	- Sampling Ports
62-297.310(6)(d)	- Work Platforms
62-297.310(6)(e)	- Access
62-297.310(6)(f)	- Electrical Power
62-297.310(6)(g)	- Equipment Support
62-297.310(7)(a)1.	- Renewal
62-297.310(7)(a)3.	- Permit Renewal Test Required
62-297.310(7)(a)4.b.	- Annual Test
62-297.310(7)(a)5.	- PM exemption if < 400 hrs/yr
62-297.310(7)(a)9.	- FDEP Notification - 15 days
62-297.310(8)	- Test Reports

Stationary Sources - BACT Steam Generators < 250 mmBtu/hr

62-296.406(2)	- Particulate Matter
62-296.406(3)	- Sulfur Dioxide

Federal Rules:

NSPS General:

40 CFR 60.7(b)	- Notification and Recordkeeping (startup/shutdown/malfunction)
40 CFR 60.7(f)	- Notification and Recordkeeping (maintain records)

40 CFR 60.8(c)	- Performance Tests (representative conditions)
40 CFR 60.8(e)	- Performance Tests (test facilities required)
40 CFR 60.8(f)	- Performance Tests (test runs)
40 CFR 60.11(a)	- Compliance (ref. S.60.8 Subpart; other than opacity)
40 CFR 60.11(b)	- Compliance (opacity determined EPA Method 9)
40 CFR 60.11(c)	- Compliance (opacity; excludes startup/shutdown/malfunction)
40 CFR 60.11(d)	- Compliance (maintain air pollution control equipment)
40 CFR 60.11(f)	- Compliance (opacity; ref. S.60.8)
40 CFR 60.12	- Circumvention

NSPS Subpart Dc:

40 CFR 60.42c(d)	- SO_2 Fuel Oil Combustion Limits
40 CFR 60.42c(h)	- Fuel Oil Sulfur Content Certification
40 CFR 60.43c(c)	- Opacity Limits
40 CFR 60.43c(d)	- Opacity Limits during startup, shutdown, or malfunction
40 CFR 60.44c(g)	- Demonstration of compliance with fuel oil sulfur limits
40 CFR 60.45c(a)(7)	- Method 9 testing
40 CFR 60.46c(d)(2)	- Fuel sampling
40 CFR 60.48c(a)	- Notification requirements
40 CFR 60.48c(d)	- Report submittal
40 CFR 60.48c(e)(11)	- Fuel oil supplier certification requirements
40 CFR 60.48c(f)(1)	- Fuel oil supplier certification information
40 CFR 60.48c(g)	- Fuel combustion records

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

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram?		2. Emission Point Type Code: 1
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point): **Exhausts through a single stack.**		
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common:		
5. Discharge Type Code: **V**	6. Stack Height: **21** feet	7. Exit Diameter: **4** feet
8. Exit Temperature: **500** °F	9. Actual Volumetric Flow Rate: **36,000** acfm	10. Water Vapor: **8.5** %
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): **Stack parameters are typical for the type of trailer-mounted boiler.**		

E. SEGMENT (PROCESS/FUEL) INFORMATION
(All Emissions Units)

Segment Description and Rate: Segment 1 of 2

1. Segment Description (Process/Fuel Type) (limit to 500 characters): **Natural Gas < 100 MMBtu/hr**		
2. Source Classification Code (SCC): **1-02-006-02**	3. SCC Units: **Million Cubic Feet Burned**	
4. Maximum Hourly Rate: **0.097**	5. Maximum Annual Rate: **776**	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit: **1020**
10. Segment Comment (limit to 200 characters): **Maximum hourly based on 1,020 Btu/cf (HHV) for the standby boiler. Maximum annual based on 8,000 hr/yr.**		

Segment Description and Rate: Segment 2 of 2

1. Segment Description (Process/Fuel Type) (limit to 500 characters): **Distillate (No. 2) Fuel Oil**		
2. Source Classification Code (SCC): **1-02-005-02**	3. SCC Units: **1,000 Gallons Burned**	
4. Maximum Hourly Rate: **0.728**	5. Maximum Annual Rate: **1,048.3**	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur: **0.5**	8. Maximum % Ash:	9. Million Btu per SCC Unit: **136**
10. Segment Comment (limit to 200 characters): **Million Btu per SCC unit = 136; based on 6.83 lb/gal; HHV 19,910 Btu/lb, ISO conditions, maximum annual rate based on a maximum of 1,440 hours of oil firing per year.**		

F. EMISSIONS UNIT POLLUTANTS
(All Emissions Units)

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
PM			
SO_2			EL
NO_x	024		EL
CO			EL
PM_{10}			

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units - Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: **PM**	2. Total Percent Efficiency of Control:
3. Potential Emissions: **1.5** lb/hour **1.7** tons/year	4. Synthetically Limited? [**X**]
5. Range of Estimated Fugitive Emissions: [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year	
6. Emission Factor: Reference: **Vendor; Golder 2000.**	7. Emissions Method Code: **2**
8. Calculation of Emissions (limit to 600 characters): **See Attachment Part II.**	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): **Lb/hr based on oil firing. TPY based on the maximum possible boiler operation of 6,160 hr/yr gas firing and 1,440 hr/yr oil firing.**	

Allowable Emissions Allowable Emissions 1 of 2

1. Basis for Allowable Emissions Code: **OTHER**	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: **VE <20% opacity**	4. Equivalent Allowable Emissions: **1.5** lb/hour **1.1** tons/year
5. Method of Compliance (limit to 60 characters): **EPA Method 9**	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): **Oil firing, 1,440 hr/yr. See Attachment Part II.**	

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units - Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: **PM**	2. Total Percent Efficiency of Control:
3. Potential Emissions: **1.5** lb/hour **1.7** tons/year	4. Synthetically Limited? [**X**]
5. Range of Estimated Fugitive Emissions: [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year	
6. Emission Factor: Reference: **Vendor; Golder 2000.**	7. Emissions Method Code: **2**
8. Calculation of Emissions (limit to 600 characters): **See Attachment Part II.**	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): **Lb/hr based on oil firing. TPY based on the maximum possible boiler operation of 6,160 hr/yr gas firing and 1,440 hr/yr oil firing.**	

Allowable Emissions Allowable Emissions 2 of 2

1. Basis for Allowable Emissions Code: **OTHER**	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: **VE < 10% opacity**	4. Equivalent Allowable Emissions: **0.2** lb/hour **0.8** tons/year
5. Method of Compliance (limit to 60 characters): **EPA Method 9**	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): **Gas Firing; 8,000 hr/yr. See Attachment Part II.**	

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units - Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: **SO_2**	2. Total Percent Efficiency of Control:

3. Potential Emissions: **29.7** lb/hour **22.3** tons/year	4. Synthetically Limited? [**X**]
5. Range of Estimated Fugitive Emissions: [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year	
6. Emission Factor: Reference: **Vendor; Golder 2000.**	7. Emissions Method Code: **2**

8. Calculation of Emissions (limit to 600 characters):

See Attachment Part II.

9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):

Lb/hr based on oil firing. TPY based on the maximum possible boiler operation of 6,160 hr/yr gas firing and 1,440 hr/yr oil firing.

Allowable Emissions Allowable Emissions 1 of 2

1. Basis for Allowable Emissions Code: **OTHER**	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: **0.5% Sulfur Oil maximum**	4. Equivalent Allowable Emissions: **29.7** lb/hour **21.4** tons/year

5. Method of Compliance (limit to 60 characters):

Fuel Sampling

6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):

Oil Firing; 1,440 hr/yr. Average sulfur content is 0.3% sulfur. See Attachment Part II.

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units - Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: **SO_2**	2. Total Percent Efficiency of Control:
3. Potential Emissions: **29.7** lb/hour **22.3** tons/year	4. Synthetically Limited? [X]
5. Range of Estimated Fugitive Emissions: [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year	
6. Emission Factor: Reference: **Vendor; Golder 2000.**	7. Emissions Method Code: **2**
8. Calculation of Emissions (limit to 600 characters): **See Attachment Part II.**	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): **Lb/hr based on oil firing. TPY based on the maximum possible boiler operation of 6,160 hr/yr gas firing and 1,440 hr/yr oil firing.**	

Allowable Emissions Allowable Emissions 2 of 2

1. Basis for Allowable Emissions Code: **OTHER**	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: **See Comment**	4. Equivalent Allowable Emissions: **0.3** lb/hour **1.2** tons/year
5. Method of Compliance (limit to 60 characters): **Pipeline Natural Gas**	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): **Pipeline natural gas, 1 g/100 cf, 8,000 hr/yr, See Attachment Part II.**	

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units - Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: **NO_X**	2. Total Percent Efficiency of Control:
3. Potential Emissions: **12.9** lb/hour **39.8** tons/year	4. Synthetically Limited? [**X**]
5. Range of Estimated Fugitive Emissions: [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year	
6. Emission Factor: Reference: **Vendor; Golder 2000.**	7. Emissions Method Code: **2**
8. Calculation of Emissions (limit to 600 characters): **See Attachment Part II.**	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): **Lb/hr based on oil firing. TPY based on the maximum possible boiler operation of 6,160 hr/yr gas firing and 1,440 hr/yr oil firing.**	

Allowable Emissions Allowable Emissions 1 of 2

1. Basis for Allowable Emissions Code: **OTHER**	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: **0.13 lb/MMBtu**	4. Equivalent Allowable Emissions: **12.9** lb/hour **9.3** tons/year
5. Method of Compliance (limit to 60 characters): **Manufacturer Certification**	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): **Annual Allowable Emissions based on 1,440 hr/yr. See Attachment Part II.**	

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units - Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: **NO_X**	2. Total Percent Efficiency of Control:
3. Potential Emissions: **12.9** lb/hour **39.8** tons/year	4. Synthetically Limited? [**X**]
5. Range of Estimated Fugitive Emissions: [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year	
6. Emission Factor: Reference: **Vendor; Golder 2000.**	7. Emissions Method Code: **2**
8. Calculation of Emissions (limit to 600 characters): **See Attachment Part II.**	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): **Lb/hr based on oil firing. TPY based on the maximum possible boiler operation of 6,160 hr/yr gas firing and 1,440 hr/yr oil firing.**	

Allowable Emissions Allowable Emissions 2 of 2

1. Basis for Allowable Emissions Code: **OTHER**	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: **0.1 lb/MMBtu**	4. Equivalent Allowable Emissions: **9.9** lb/hour **39.6** tons/year
5. Method of Compliance (limit to 60 characters): **Manufacturer Certification**	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): **Annual Allowable Emissions based on 8,000 hr/yr. See Attachment Part II.**	

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units - Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: **CO**	2. Total Percent Efficiency of Control:	
3. Potential Emissions: **14.9** lb/hour **59.4** tons/year		4. Synthetically Limited? [X]
5. Range of Estimated Fugitive Emissions: [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year		
6. Emission Factor: Reference:		7. Emissions Method Code: **2**
8. Calculation of Emissions (limit to 600 characters): **See Attachment Part II.**		
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): **Lb/hr based on oil firing. TPY based on the maximum possible boiler operation of 8,000 hr/yr gas firing.**		

Allowable Emissions Allowable Emissions 1 of 2

1. Basis for Allowable Emissions Code: **OTHER**	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: **0.15 lb/MMBtu**	4. Equivalent Allowable Emissions: **14.9** lb/hour **10.7** tons/year
5. Method of Compliance (limit to 60 characters): **Manufacturer Certification**	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): **Oil firing for 1,440 hr/yr. See Attachment Part II.**	

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units - Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: **CO**	2. Total Percent Efficiency of Control:
3. Potential Emissions: **14.9** lb/hour **59.4** tons/year	4. Synthetically Limited? [X]
5. Range of Estimated Fugitive Emissions: [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year	
6. Emission Factor: Reference:	7. Emissions Method Code: **2**
8. Calculation of Emissions (limit to 600 characters): **See Attachment Part II.**	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): **Lb/hr based on oil firing. TPY based on the maximum possible boiler operation of 8,000 hr/yr gas firing.**	

Allowable Emissions Allowable Emissions 2 of 2

1. Basis for Allowable Emissions Code: **OTHER**	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: **0.15 lb/MMBtu**	4. Equivalent Allowable Emissions: **14.9** lb/hour **59.4** tons/year
5. Method of Compliance (limit to 60 characters): **Manufacturer Certification**	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): **Based on 8,000 hr/yr gas firing. See Attachment Part II.**	

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units - Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: **PM_{10}**	2. Total Percent Efficiency of Control:
3. Potential Emissions: **1.5** lb/hour **1.7** tons/year	4. Synthetically Limited? [X]
5. Range of Estimated Fugitive Emissions: [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year	
6. Emission Factor: Reference: **Vendor; Golder 2000.**	7. Emissions Method Code: **2**
8. Calculation of Emissions (limit to 600 characters): **See Attachment Part II.**	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): **Lb/hr based on oil firing. TPY based on the maximum possible boiler operation of 6,160 hr/yr gas firing and 1,440 hr/yr oil firing.**	

Allowable Emissions Allowable Emissions 1 of 2

1. Basis for Allowable Emissions Code: **OTHER**	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: **VE < 20% opacity**	4. Equivalent Allowable Emissions: **1.5** lb/hour **1.1** tons/year
5. Method of Compliance (limit to 60 characters): **EPA Method 9**	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): **Oil firing, 1,440 hr/yr. See Attachment Part II.**	

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units - Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: **PM_{10}**	2. Total Percent Efficiency of Control:
3. Potential Emissions: **1.5** lb/hour **1.7** tons/year	4. Synthetically Limited? [X]
5. Range of Estimated Fugitive Emissions: [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year	
6. Emission Factor: Reference: **Vendor; Golder 2000.**	7. Emissions Method Code: **2**
8. Calculation of Emissions (limit to 600 characters): **See Attachment Part II.**	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): **Lb/hr based on oil firing. TPY based on the maximum possible boiler operation of 6,160 hr/yr gas firing and 1,440 hr/yr oil firing.**	

Allowable Emissions Allowable Emissions 2 of 2

1. Basis for Allowable Emissions Code: **OTHER**	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: **VE < 10% opacity**	4. Equivalent Allowable Emissions: **0.2** lb/hour **0.8** tons/year
5. Method of Compliance (limit to 60 characters): **EPA Method 9**	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): **Gas firing; 8,000 hr/yr. See Attachment Part II.**	

H. VISIBLE EMISSIONS INFORMATION
(Only Regulated Emissions Units Subject to a VE Limitation)

Visible Emissions Limitation: Visible Emissions Limitation 1 of 1

1. Visible Emissions Subtype: **VE20**	2. Basis for Allowable Opacity: [X] Rule [ ] Other
3. Requested Allowable Opacity: Normal Conditions: **20** % Exceptional Conditions: **100** % Maximum Period of Excess Opacity Allowed: **60** min/hour	
4. Method of Compliance: **Annual VE Test EPA Method 9**	
5. Visible Emissions Comment (limit to 200 characters): **VE of 20% proposed for distillate oil firing. VE of 10% proposed for gas firing. Excess opacity based on Rule 62-210.700.**	

I. CONTINUOUS MONITOR INFORMATION
(Only Regulated Emissions Units Subject to Continuous Monitoring)

Continuous Monitoring System: Continuous Monitor _____ of _____

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	[ ] Rule [ ] 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):	

J. EMISSIONS UNIT SUPPLEMENTAL INFORMATION
(Regulated Emissions Units Only)

Supplemental Requirements

1. Process Flow Diagram [ ] Attached, Document ID:_____ [X] Not Applicable [ ] Waiver Requested
2. Fuel Analysis or Specification [ ] Attached, Document ID:_____ [X] Not Applicable [ ] Waiver Requested
3. Detailed Description of Control Equipment [ ] Attached, Document ID:_____ [X] Not Applicable [ ] Waiver Requested
4. Description of Stack Sampling Facilities [ ] Attached, Document ID:_____ [X] Not Applicable [ ] Waiver Requested
5. Compliance Test Report [ ] Attached, Document ID:_____ [ ] Previously submitted, Date:_____ [X] Not Applicable
6. Procedures for Startup and Shutdown [ ] Attached, Document ID:_____ [X] Not Applicable [ ] Waiver Requested
7. Operation and Maintenance Plan [ ] Attached, Document ID:_____ [X] Not Applicable [ ] Waiver Requested
8. Supplemental Information for Construction Permit Application [X] Attached, Document ID: Part II [ ] Not Applicable
9. Other Information Required by Rule or Statute [ ] Attached, Document ID:_____ [X] Not Applicable
10. Supplemental Requirements Comment:

Additional Supplemental Requirements for Title V Air Operation Permit Applications

11. Alternative Methods of Operation
[ ] Attached, Document ID:_____ [ ] Not Applicable

12. Alternative Modes of Operation (Emissions Trading)
[ ] Attached, Document ID:_____ [ ] Not Applicable

13. Identification of Additional Applicable Requirements
[ ] Attached, Document ID:_____ [ ] Not Applicable

14. Compliance Assurance Monitoring Plan
[ ] Attached, Document ID:_____ [ ] Not Applicable

15. Acid Rain Part Application (Hard-copy Required)

[ ] Acid Rain Part - Phase II (Form No. 62-210.900(1)(a))
Attached, Document ID:_____

[ ] Repowering Extension Plan (Form No. 62-210.900(1)(a)1.)
Attached, Document ID:_____

[ ] New Unit Exemption (Form No. 62-210.900(1)(a)2.)
Attached, Document ID:_____

[ ] Retired Unit Exemption (Form No. 62-210.900(1)(a)3.)
Attached, Document ID:_____

[ ] Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.)
Attached, Document ID:_____

[ ] Phase NOx Averaging Plan (Form No. 62-210.900(1)(a)5.)
Attached, Document ID:_____

[ ] Not Applicable

PART II

SUPPORTING INFORMATION

1.0 INTRODUCTION

Tropicana Products, Inc. is proposing to install and operate one standby steam boiler at the existing Bradenton Citrus Processing Plant. The steam boiler will operate to supplement steam generated by the existing auxiliary boiler and combined cycle combustion turbine. The standby boiler will be operated when either of the existing steam sources are at reduced operating loads or not operating. The boiler will be a trailer-mounted boiler that will be rented as necessary to provide supplemental steam. The standby boiler will be fired primarily with pipeline quality natural gas and distillate fuel oil will be used as a backup.

1.1 EXISTING FACILITY AND PROPOSED STANDBY STEAM BOILER

The Tropicana facility is located at 1001 13th Avenue East, Bradenton, Florida. The existing industrial complex includes glass manufacturing, and citrus processing that includes juice extracting, processing, packaging, warehousing, and distribution. Fruit is graded and carried to an extractor room where the juice is removed and pumped to either carton filling, glass filling, plastic filling, block freezing, aseptic storage or to evaporators for concentrate production.

The plant contains three citrus feed mills, four citrus pellet mills (including two pellet coolers and associated pellet, bulk cooling reels, and Ross coolers), two glass plants, cogeneration facility (combustion turbine, heat recovery steam generator (HRSG), duct burner, auxiliary boiler, sanitary process steam boiler (used to produce 5-fold citrus oil), and a wastewater treatment system that includes a package steam boiler and an anaerobic reactor with a biogass flare.

The proposed standby steam boiler will be rented on a temporary basis as needed for supplying steam to supplement or replace the steam generated by the auxiliary boiler and cogeneration unit. The standby boiler will have a nominal steam rating of 70,000 pounds (lb) of steam per hour. A maximum heat input of 99 million British thermal units per hour (MMBtu/hr) is proposed to envelope the possible boilers that can be rented. The fuel will be primarily pipeline-quality natural gas with No. 2 fuel oil as a backup fuel. The fuel oil will contain a maximum of 0.5 percent sulfur and an average of 0.3 percent sulfur.

1.2 STANDBY STEAM BOILER EMISSION ESTIMATION

The estimated hourly and annual criteria pollutant emissions from the standby steam boiler are provided in Table 1. The boiler emissions are based on a total heat input rate of 99.0 MMBtu/hr and a total fuel usage rate of 97,059 standard cubic feet per hour of pipeline quality natural gas or 728 gallons per hour of No. 2 fuel oil with 0.05-percent sulfur. Actual hourly emissions are expected to be lower since the capacity of the boilers available for this purpose have a heat input rate of less than 99 mmBtu/hr.

The standby boiler emissions are based on 8,000 hours per year of operation when firing natural gas. Up to 1,440 hours per year (60 days) of distillate fuel oil firing is being proposed as the back-up fuel requirements. Specific vendor information for the standby steam boiler is provided in Attachment A.

The operation of the boiler is proposed to be limited by the equivalent heat input of operating 8,000 hr/yr on natural gas of 792,000 mmBtu/yr (99 mmBtu/hr times 8,000 hr/yr). Distillate oil usage is proposed as a backup fuel up to an equivalent of 1,440 hr/yr or 142,560 mmBtu/yr (99 mmBtu/hr times 1,440 hr/yr). In the event distillate oil is burned, the maximum amount of gas authorized would be decreased by a factor of 1.3. For example, if 50,000 mmBtu/yr of distillate oil were burned, then the annual amount of gas authorized would decrease by 65,000 mmBtu/yr (1.3 times 50,000 mmBtu/yr). This schedule is being proposed to make the NO_x emissions equivalent and less than 40 TPY (i.e., the PSD Threshold; see Section 1.3).

1.3 APPLICABLE REQUIREMENTS AND PERMITTING CONDITIONS

A modification is defined in Rule 62-210.200 Florida Administrative Code (F.A.C.) as any physical change in, or a change in the method of operation of, or addition to a facility which would result in an increase in the actual emissions of any air pollutant subject to regulation under the Clean Air Act. A modification to a major source of air pollution, such as the Tropicana Bradenton Citrus Processing Plant, may be subject to review under the

Department's Prevention of Significant Deterioration (PSD) rules codified in Rule 62-212.400 F.A.C.

The proposed fuel use limitations will limit the potential emission rates for the standby steam boiler to be less than the PSD significant emission rates in Table 62-212.400-2 in Rule 62-212.400 F.A.C. Therefore, PSD review would not apply. The Tropicana Bradenton facility will record the fuel use and hours of operation for the standby boiler to demonstrate compliance.

The standby boiler will also be subject to specific standards in 62-296.406, F.A.C., applicable to fossil fuel steam generators with less than 250 MMBtu/hr heat input. The maximum heat input rate of the proposed standby steam boiler is 99 MMBtu/hr and therefore will be subject to this rule. F.A.C. 62-296.406(1) requires that visible emissions from the standby boiler will be limited to 20-percent opacity, except for either one 6-minute period per hour during which opacity shall not exceed 27 percent, or one 2-minute period per hour during which opacity shall not exceed 40 percent. Method 9 will be used demonstrate compliance with the opacity limits on an annual basis. Rules 62-296.406(2) and (3) require that best achievable control technology (BACT) for PM and SO_2 be applied to the standby steam boiler. The BACT requirements and analysis are presented in Section 2.0.

The standby steam boiler will be subject to 40 CFR 60, Subpart Dc, *New Source Performance Standards for Small Industrial-Commercial-Institutional Steam Generating Units*. According to the rule, a boiler less than 100 MMBtu/hr may emit no more than 0.5 pounds/MMBtu of SO_2, or as an alternative, must burn fuel oil with a maximum sulfur content of 0.50 percent. In addition, the boiler will be subject to a 20-percent opacity limitation, except up to 6 minutes per hour, the opacity must not exceed 27 percent. The standby boiler will comply with these requirements by testing the fuel oil sulfur content and performing an annual Method 9 test for opacity.

2.0 BACT ANALYSIS

2.1 REQUIREMENTS

The control technology review requirements of the state regulations require that all applicable state emissions-limiting standards are met, and that BACT be applied to control emissions from the source. Rule 62-296.406, F.A.C., requires BACT for PM and SO_2. BACT is defined in Rule 62-210.200(42) as:

> An emission limitation, including a visible emissions standard, based on the maximum degree of reduction of each pollutant emitted which the Department, 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 (including fuel cleaning or treatment or innovative fuel combustion techniques) for control of each such pollutant. If the Department determines that technological or economic limitations on the application of measurement methodology to a particular part of an emissions unit or facility would make the imposition of an emission standard infeasible, a design, equipment, work practice, operational standard or combination thereof, may be prescribed instead to satisfy the requirement for the application of BACT. Such standard shall, to the degree possible, set forth the emissions reductions achievable by implementation of such design, equipment, work practice or operation.

The BACT requirements are intended to ensure that the control systems incorporated in the design of a proposed facility reflect the latest in control technologies used in that particular industry and take into consideration existing and future air quality in the vicinity of the proposed facility. BACT must, as a minimum, demonstrate compliance with NSPS for a source (if applicable). An evaluation of the air pollution control techniques and systems, including a cost-benefit analysis of alternative control technologies capable of achieving a higher degree of emission reduction than the proposed control technology, is required. The cost-benefit analysis requires the documentation of the materials, energy, and economic penalties associated with the proposed and alternative control systems, as well as the environmental benefits derived from these systems. A decision on BACT is to be based on sound judgement, balancing environmental benefits with energy, economic, and other impacts (EPA, 1978).

2.2 PROPOSED BACT FOR SO_2

There are no technically feasible methods for controlling the emissions of SO_2 from small steam boilers other than the inherent quality of the fuel. Therefore, the proposed BACT for SO_2 emissions from the standby steam boiler will be based on burning pipeline quality natural gas and very low sulfur fuel oil. Tropicana Bradenton will use pipeline quality natural gas as the primary fuel with a sulfur content of 1 grain per 100 cubic feet. Distillate fuel oil will be used as a backup fuel with a maximum sulfur content of 0.5 percent, which is currently authorized for the auxiliary boiler.

2.3 PROPOSED BACT FOR PM

PM emissions from the standby steam boiler are estimated to be less than 2 TPY. Due to the low emissions, no control equipment is recommended for PM. The proposed BACT is to use No. 2 fuel oil with a maximum sulfur content of 0.5 percent. It is proposed that no further particulate controls are necessary for the proposed standby boiler.

Table 1. Stand-By Boiler Criteria Emissions (nominal 70,000 lb/hr steam)

	Gas Firing		Oil Firing		Maximum Tons per year[b]	
	(lb/MMBtu)[a]	(lb/hr)	(lb/MMBtu)[a]	(lb/hr)	(Case A)	(Case B)
PM as TSP	0.002	0.20	0.015	1.49	0.79	1.68
PM10	0.002	0.20	0.015	1.49	0.79	1.68
NO_x	0.1	9.90	0.13	12.87	39.60	39.76
SO2	0.003	0.30	0.3	29.70	1.19	22.30
CO	0.15	14.85	0.15	14.85	59.40	56.43
VOCs	0.004	0.40	0.004	0.40	1.58	1.50

Heat Input:

Gas (MMBtu/hr) = 99 MMBtu/hr - Gas

Oil (MMBtu/hr) = 99 MMBtu/hr - Oil

[a] Vendor provided values

[b] Maximim emission cases:

	Number of Hours for Operation	
Operation	Gas Only	Gas and Oil
100 % Load - Gas	8,000	6,160
100 % Load - Oil	0	1,440
Total hours	8,000	7,600

ATTACHMENT A

MANUFACTURER INFORMATION FOR
THE STANDBY STEAM BOILER
(EXAMPLE OF TYPICAL TRAILER-MOUNTED BOILER)

Indeck Power Equipment Company
1111 S. Willis Avenue
Wheeling, IL 60090

To:	**Steve Maltby**
Company:	**Golder Ass.**
Phone:	**352-336-5600**
Fax:	**352-336-6603**
From:	**John P. Sullivan**
Title:	**National Sales Engineer**
Phone:	**(847) 541-8300**
Fax:	**(847) 541-9984**
E-Mail:	jsullivan45@compuserve.com
Date:	**10/25/00**
Total Pages Sent:	**1**

RE: 70,000 PPH Rental Boiler Emissions

RE: INDECK QUOTE DATED 8/9/00

NATURAL GAS :		**NO. 2 OIL:**	
NOX:	84 PPM	NOX:	101 PPM
CO:	200 PPM	CO:	200 PPM
PARTICULATE:	.01 LBS/MM/BTU	PARTICULATE:	.05 LBS/MM/BTU
VOC:	.004 LBS/MM/BTU	VOC:	.004 LBS/MM/BTU
SO2:	.003 LBS/MM/BTU	SO2	.164 LBS/MM/BTU
SOX:	.001 LBS/MM/BTU	SOX:	.151 LBS/MM/BTU

INDECK POWER EQUIPMENT COMPANY • 1111 SOUTH WILLIS AVENUE • WHEELING, ILLINOIS 60090-5841
847/541-8300 • TELEX 28-3544 • FAX 847/541-9984

INDECK®

August 9, 2000

Facsimile No. 941-742-2900
Tropicana
1001 – 13th Avenue East
Bradenton, Florida 34208

Attention: Mr. Tom Williams
Phone: 941-742-2740

Reference: Telephone Conversation of August 9, 2000

Subject: Rental Boiler

Dear Mr. Williams:

In accordance with your request, I am pleased to provide the following for your review and consideration.

70,000 PPH Trailer Mounted Boiler

One (1) 70,000 lb./hr. Indeck trailer mounted steam system, designed and built to the ASME Power Boiler Code for 350 psig design pressure with an operating pressure range of 125-335 psig. The unit is arranged to fire either natural gas requiring regulated gas pressure of 10 psig at the trailer connection or #2 fuel oil with either fuel requiring a gas pilot. The unit is complete with the manufacturer's standard trim, Low NOx burner, electric single point positioning combustion controls, Industrial Risk Insurance (IRI) approved fuel trains, automatic relay type non-recycling burner management system and a forced draft fan, coupled to a 75 HP, TEFC drive motor requiring 480 volts, 3-phase, 60 Hertz power. The following list of auxiliary equipment is shipped loose on the trailer for field mounting by others.,

a. 6 ft. high stack & transition assembly.
b. 8" - 300 psig flanged steam non-return valve.
c. ASME safety relief valves set at 350 psig.
d. Bottom drum tandem blowdown valves.
e. Flanged upper forced draft fan housing.

The above 70,000 lb./hr. steam boiler is mounted on a 52 ft. long specially designed trailer.

INDECK

Your net price for the above described trailer mounted boiler system is $24,000.00/month, f.o.b. Wheeling, Illinois.

Estimated freight charges to Bradenton, Florida and return are $4,400.00 each way.

The above mobile steam system is currently in-stock and available for shipment. All equipment is offered subject to prior rental/sale.

After the equipment has been properly installed by others and is ready for operation, we do require that an Indeck Service Technician supervise the initial start-up by your operators and train your operating personnel. This service will be billed at $750.00/8 hour day (straight time) plus travel and expenses for the Engineer on a portal to portal basis. Expenses will be billed at cost plus 15% supported by third party receipts.

WARRANTY

After start-up, should any failures of the following types occur, they will be repaired at **no cost** to you.

Bearings	Refractory
Blowers	Safety Valves
Controls	Tubes
Electric Motors	Valves
Gauges	Water Columns
Leaking Gaskets	Wiring

The above guarantee includes all parts and labor and extends throughout the entire rental period.

Also, a full rental credit will be allowed for all down days.

Users are responsible for:

A. Returning defective part(s) within 30 days of shipment of warranty part(s).
B. Indeck Power Equipment Company requires that ABMA guidelines are maintained within the steam drum of our boilers.
C. Proper care and maintenance of the equipment
D. Providing competent operators

INDECK

August 9, 2000

E. A temporary shelter to protect the burner and controls from the environment. The shelter must be substantial enough to protect from rain and freezing temperatures. If necessary, a heater needs to be supplied to keep the burner and controls above 32 Deg. Some areas of the country may require a complete shelter depending upon your location.

Please note that the above quoted prices do not include any taxes, permits, fees, duties, etc.

I have enclosed a customer connection drawing and specifics on the unit quoted herein for your review.

Thank you for the opportunity of quoting our equipment and after review of the above, should you have any questions or require additional information, please feel free to contact me at your convenience.

Very truly yours,

INDECK POWER EQUIPMENT COMPANY

John P. Sullivan
Sales Engineer

JPS/mg
Enclosures

70,000 PPH Rental Boiler Specifications

General Information:
One (1) 70,000 PPH trailer mounted watertube steam boiler, designed to the ASME Code for 350 psig design pressure, arranged for natural gas or #2 oil firing, complete with manufacturer's standard boiler trim, Low NO_x burner, and combustion controls.

Boiler Information:	
Design Pressure	350 PSI
Maximum Operating Pressure	325 PSI
Minimum Operating Pressure	125 PSI
Gas Fired Requirements:	
Gas Consumption (100%)	88,435 SCFH
Gas Pressure Required at Connection	
Must be Regulated to	10-12 PSI
Electrical Amps on Gas Firing	110
Emissions Information	Upon Request
Low NO_x Burner	All Units
Oil Fired Requirements :(#2 Oil Only)	
Oil Consumption (100%)	606 GPH
Minimum Oil Pressure At Connection	Positive
Maximum Oil Pressure At Connection	30 PSI
Pilot Gas Pressure Required for Oil Start-up	2.0 PSI
Oil Atomization (Air)	
Minimum Air Pressure	80 PSI
Maximum Air Pressure	120 PSI
Air Consumption	35 SCFM
Min. Capacity Req'd for Steam Atomization	25%
Oil Atomization (Steam) - Steam Pressure Required	125 PSI
Electrical Amps on Oil Firing	125
Emissions Information	Upon Request with Supplied Fuel Analysis
Low NO_x Burner	All Units
Feedwater Requirements:	
Minimum Feedwater Pressure	60-75 PSI Above Operating Pressure
Maximum Feedwater Pressure	100 PSI Above Operating Pressure
Minimum Feedwater Temperature	240 Deg. F.
Electrical Requirements - Single Point Connection:	
Electrical Amps- Gas Fired	110
Electrical Amps- Oil Fired	125
F.D. Fan	75 HP
Oil Pump (#2 Oil Only)	2 HP
Voltage	480V/3-Phase
Motor Starter	Included
Transformer (480 to 120)	Included
Instrument Quality Compressed Air Required for Feedwater Control Valve:	
Minimum Air Pressure	50 PSI
Maximum Air Pressure	120 PSI

Auxiliary Equipment to be Field Mounted by Others:

(1) 6 ft. high stack and transition assembly.
(1) 8" - 300 psig flanged steam non-return valve.
(2) Bottom drum tandem blowdown valves.
(2) ASME safety relief valves set at 350 psi.
(1) Flanged upper forced draft fan housing.

Dimensional Information:	
Trailer Width	10' - 6"
Trailer Length	52 Ft.
Shipping Weight	89,750 lbs.
Operating Weight	107,350 lbs.
Stack Diameter	48"

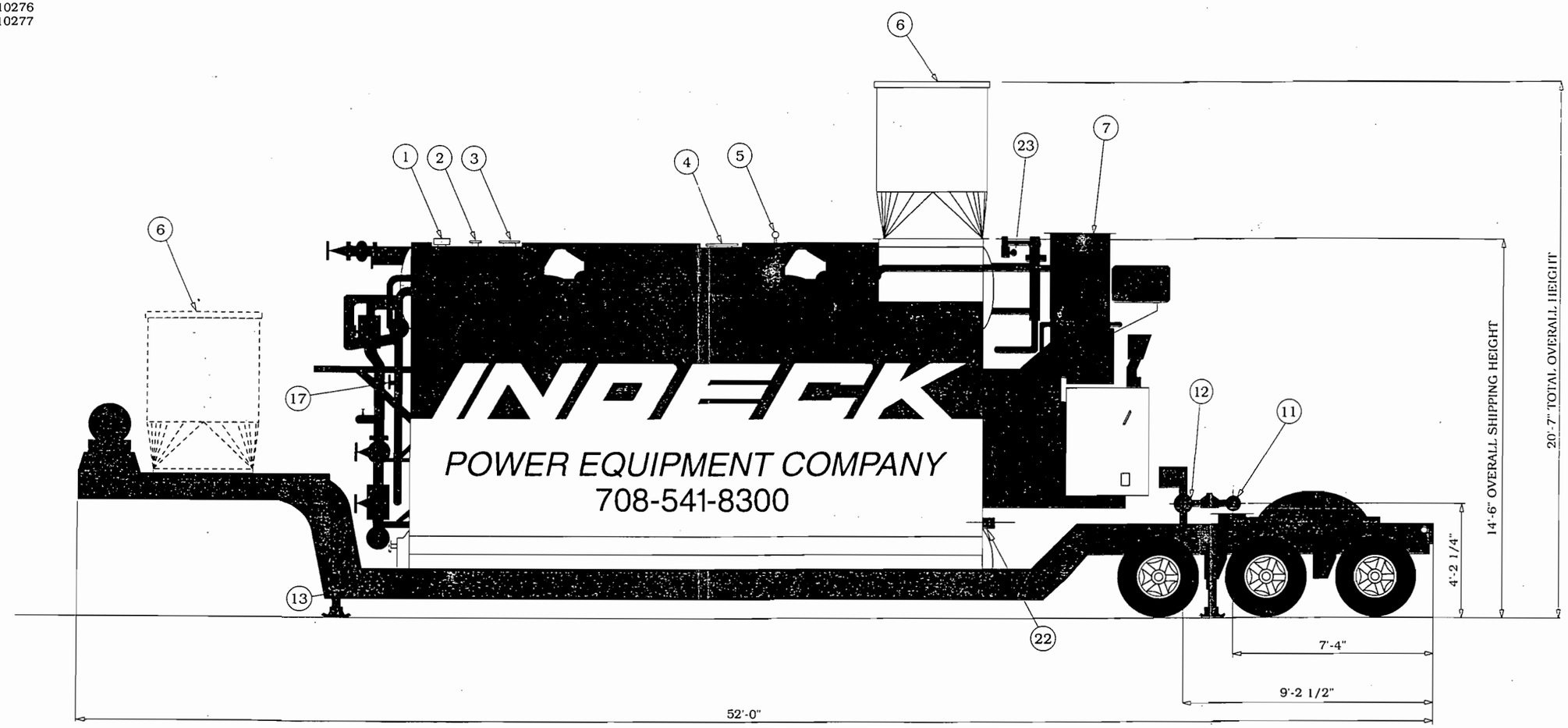
INDECK

INDECK POWER EQUIPMENT CO.
1111 S. Willis Avenue
Wheeling, Illinois 60090
(708) 541-8300
(800) 446-3325
FAX: (708) 541-9984

For further information, see customer connection drawing or contact Indeck at 1-708-541-8300.

UNIT REFERENCE:
87L 14-10272
88L 14-10273
89L 14-10274
90L 14-10275
91L 14-10276
92L 14-10277

70,000 PPH RENTAL BOILER



INSTALLATION SERVICE CONNECTIONS

1. 3"-300# SAFETY VALVE CONNECTION (SAFETY VALVE MUST BE REMOVED FOR TRANSPORT)
2. 3"-300# SAFETY VALVE CONNECTION (SAFETY VALVE MUST BE REMOVED FOR TRANSPORT)
3. 3"-300# SAFETY VALVE CONNECTION (SAFETY VALVE MUST BE REMOVED FOR TRANSPORT) (& FOR LOW PRESSURE OPERATION ONLY)
4. 8"-300 # MAIN STEAM OUTLET CONNECTION
5. 1" NPT DRUM VENT / AUX CONNECTION
6. FLUE GAS STACK AND TRANSITION (REMOVED FOR TRANSPORT)
7. UPPER F.D. FAN HOUSING (REMOVABLE TO PROVIDE ADDITIONAL SHIPPING CLEARANCE (FLANGED))
8. 1 1/2"-300# AUX ATOMIZING AIR / STEAM CONNECTION (LOCATED BEHIND CABINET)
9. 1/2" NPT PILOT GAS CONNECTIONS (NAT OR PROPANE) (LOCATED BEHIND CABINET)
10. 3/4" NPT FUEL OIL RETURN CONNECTION (LOCATED ON OPPOSITE SIDE OF TRAILER)
11. 1-1/2"-NPT FUEL OIL SUPPLY CONNECTION (LOCATED ON OPPOSITE SIDE OF TRAILER)
12. 4"-150 # FUEL GAS CONNECTION
13. 1-1/2"-300 # BLOW OFF CONNECTION
14. 1-1/2"-300 # LOWER DRUM HEATING COIL CONNECTIONS
15. 3/4" NPT CHEMICAL FEED CONNECTION
16. 1" CONTINUOUS BLOWDOWN CONNECTION (LOCATED ON OPPOSITE SIDE OF TRAILER)
17. 2-1/2"-300 # FEEDWATER SUPPLY CONNECTION
18. 460/60/3 POWER SUPPLY 150 AMPS
19. 3"-300# SOOT BLOWER STEAM SUPPLY CONNECTION
20. 2"-300# CHEMICAL CLEANING CONNECTION
21. 1" NPT FURNACE PRESS CONNECTION
22. WASHOUT
23. 1/4" NPT INSTRUMENT AIR CONNECTION

DESIGN DATA

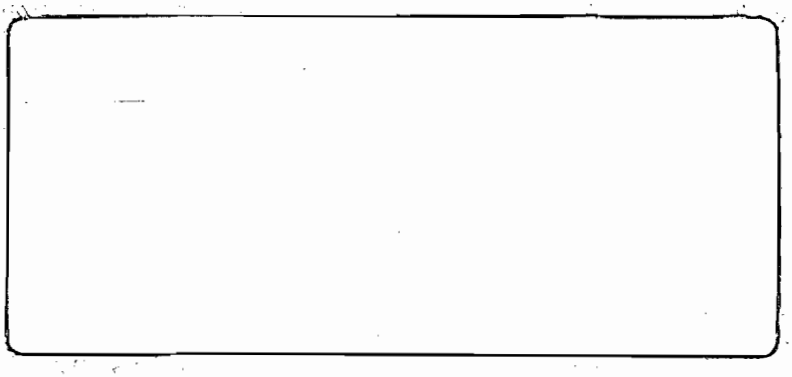
OVERALL LENGTH:	52'-0"
OVERALL WIDTH:	10'-6"
NET WEIGHT (INCL TRAILER):	89,750 LBS
CONTINUOUS CAPACITY:	70,000 PPH
DESIGN PRESSURE:	350 PSIG
FEEDWATER TEMPERATURE:	220 DEG F
FURNACE VOLUME:	854 CU. FT.
CONVECTION HEATING SURFACE:	3647 SQ. FT.
RADIANT HEATING SURFACE:	620 SQ. FT.
TOTAL HEATING SURFACE:	4267 SQ. FT. (A.S.M.E.)
GAS SUPPLY PRESSURE	10 PSIG (REGULATED BY CUSTOMER)
OIL SUPPLY PRESSURE	30 PSIG FLOODED MAX.
FEED WATER PRESSURE	75-100 PSIG ABOVE OPERATING PRESSURE
INSTRUMENT AIR PRESSURE	50 PSIG MIN.

NOTE 1: A NATURAL GAS OR PROPANE PILOT IS REQUIRED FOR OIL
NOTE 2: PROVIDE ADEQUATE WEATHER PROTECTION FOR BURNER, CONTROLS AND PERSONNEL

C.F. NO. TRAILER\70-350

INDECK 70,000 PPH RENTAL BOILER

INDECK POWER EQUIPMENT COMPANY
1111 WILLIS AVENUE, WHEELING, ILLINOIS 60090



Golder Associates

Tropicana

VIA OVERNIGHT DELIVERY
January 8, 2001

Mr. Joseph Kahn, P.E.
Florida Department of Environmental Protection
Bureau of Air Regulation
Mail Station #5505
2600 Blair Stone Road
Tallahassee, Florida 32339-2400

RE: PERMIT NO. 0810007-003-AV

Dear Mr. Kahn:

Enclosed are four copies of an application for a minor source permit at the above-referenced Title V facility. This application requests approval for Tropicana to bring a mobile steam-generating unit on site during periods when additional steam is needed at the facility. These conditions would exist when either of the existing steam generating units at the facility (Auxiliary Boiler or Cogeneration Turbine) is inoperable. It also would provide Tropicana the flexibility to reduce operation of its Cogeneration facility during periods of high natural gas pricing, such as exists today.

Under separate cover, Tropicana has submitted a request for an emergency order to operate this unit. That request was made due to the severe cold weather we are experiencing, which is limiting our ability to operate the Cogeneration Turbine, coupled with the requirement to salvage freeze-damaged fruit during the next four to seven weeks. Obviously, it would be in our best interest to have this unit permanently permitted, and whatever you can do to expedite this process would be greatly appreciated.

If you have any questions, please contact me at 941-742-2748.

Sincerely,

Douglas E. Foster
Director, Corporate Environmental & Safety

D529/jb

Enclosures
cc: Karen Collins-Manatee Co. Env. Management Dept. (w/enc.)
Deborah Getzoff-FDEP, SWD
G. L. Kissel, P.E., FDEP, SWD
Kennard Kosky, P.E.-Golder Associates
Bill Thomas, P.E.-FDEP, SWD
George Cassady-TPI
Tom Hovanec-TPI

APPLICATION FOR AIR PERMIT
INSTALLATION OF A STANDBY
BOILER FOR TROPICANA PRODUCTS, INC.
BRADENTON CITRUS PROCESSING FACILITY

Prepared For:

Tropicana Products, Inc.
Bradenton Citrus Processing Plant
1001 13th Avenue, East
Bradenton, Manatee 34208

Prepared By:

Golder Associates Inc.
6241 NW 23rd Street, Suite 500
Gainesville, Florida 32653-1500

December 2001
9837588Y/F2

DISTRIBUTION:
4 Copies - FDEP
2 Copies - Tropicana Products, Inc.
1 Copy - Golder Associates Inc.

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1.2 STANDBY STEAM BOILER EMISSION ESTIMATION 2

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2.3 PROPOSED BACT FOR PM 5

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LIST OF ATTACHMENTS

ATTACHMENT A TYPICAL MANUFACTURER INFORMATION FOR THE STANDBY STEAM BOILER

PART I

APPLICATION FOR AIR PERMIT
LONG FORM

Department of Environmental Protection

Division of Air Resources Management

APPLICATION FOR AIR PERMIT - TITLE V SOURCE

See Instructions for Form No. 62-210.900(1)

I. APPLICATION INFORMATION

Identification of Facility

1. Facility Owner/Company Name: **Tropicana Products, Inc.**	
2. Site Name: **Bradenton Citrus Processing Facility**	
3. Facility Identification Number: **0810007** [ ] Unknown	
4. Facility Location: Street Address or Other Locator: **1001 13th Avenue** City: **Bradenton** County: **Manatee** Zip Code: **34208**	
5. Relocatable Facility? [ ] Yes [**X**] No	6. Existing Permitted Facility? [**X**] Yes [ ] No

Application Contact

1. Name and Title of Application Contact: **Douglas E. Foster, Manager, Environmental Affairs**
2. Application Contact Mailing Address: Organization/Firm: **Tropicana Products, Inc.** Street Address: **P.O. Box 338** City: **Bradenton** State: **FL** Zip Code: **34206**
3. Application Contact Telephone Numbers: Telephone: (**941**) **742 - 2748** Fax: (**941**) **749 - 3768**

Application Processing Information (DEP Use)

1. Date of Receipt of Application:	1/10/01
2. Permit Number:	0810007 - 008 - AC
3. PSD Number (if applicable):	
4. Siting Number (if applicable):	

Purpose of Application

Air Operation Permit Application

This Application for Air Permit is submitted to obtain: (Check one)

[ ] Initial Title V air operation permit for an existing facility which is classified as a Title V source.

[ ] Initial Title V air operation permit 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:_____

[ ] Title V air operation permit revision to address one or more newly constructed or modified emissions units addressed in this application.

Current construction permit number:_____

Operation permit number to be revised:_____

[ ] Title V air operation permit revision or administrative correction to address one or more proposed new or modified emissions units and to be processed concurrently with the air construction permit application. (Also check Air Construction Permit Application below.)

Operation permit number to be revised/corrected:_____

[ ] Title V air operation permit revision 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 number to be revised:_____

Reason for revision:_____

Air Construction Permit Application

This Application for Air Permit is submitted to obtain: (Check one)

[X] Air construction permit to construct or modify one or more emissions units.

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

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

Owner/Authorized Representative or Responsible Official

1. Name and Title of Owner/Authorized Representative or Responsible Official:
   Donald Antenore, Vice President, Manufacturing
2. Owner/Authorized Representative or Responsible Official Mailing Address:
   Organization/Firm: **Tropicana Products, Inc.**
   Street Address: **P.O. Box 338**
   City: **Bradenton** State: **FL** Zip Code: **34206**
3. Owner/Authorized Representative or Responsible Official Telephone Numbers:
   Telephone: (**941**) **742 - 2023** Fax: (**941**) **749 - 2049**
4. Owner/Authorized Representative or Responsible Official Statement:

   I, the undersigned, am the owner or authorized representative(check here [ ], if so) or the responsible official (check here [ ], if so) 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.*

   Donald E Antenore — Signature

   01/07/01 — Date

* Attach letter of authorization if not currently on file.

Professional Engineer Certification

1. Professional Engineer Name: **Kennard F. Kosky**
   Registration Number: **14996**
2. Professional Engineer Mailing Address:
   Organization/Firm: **Golder Associates Inc.**
   Street Address: **6241 NW 23rd Street, Suite 500**
   City: **Gainesville** State: **FL** Zip Code: **32653-1500**
3. Professional Engineer Telephone Numbers:
   Telephone: (**352**) **336 - 5600** Fax: (**352**) **336 - 6603**

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 — Date: 1/5/01

(seal)

* Attach any exception to certification statement.

Scope of Application

Emissions Unit ID	Description of Emissions Unit	Permit Type	Processing Fee
023	Standby Boiler	AC1D	

Application Processing Fee

Check one: [ ] Attached - Amount: $: _____ [X] Not Applicable

Construction/Modification Information

1. Description of Proposed Project or Alterations:

   Installation of one 70,000 lb/hr (nominal steam rating) trailer-mounted steam boiler. The boiler will be used to replace or supplement steam generated by the existing cogeneration unit (Emission Unit No. 016) and the auxiliary boiler (Emission Unit No. 015). The unit is capable of firing either natural gas or No. 2 fuel oil. The unit includes a low NO_X burner.

2. Projected or Actual Date of Commencement of Construction: **1 Feb 2001**

3. Projected Date of Completion of Construction: **1 Feb 2001**

Application Comment

The boiler will be used as a supplemental source of steam. Operation of the boiler will supplement steam generated by the cogeneration unit and auxiliary boiler. The facility holds a Title V permit and, therefore, a construction permit fee is not required pursuant to Rule 62-4.050(4)(a)2. While the emission unit will have potential emissions of less than PSD thresholds for a major modification. Therefore PSD review is not required.

II. FACILITY INFORMATION

A. GENERAL FACILITY INFORMATION

Facility Location and Type

1. Facility UTM Coordinates: Zone: **17** East (km): **561.4** North (km): **3056.5**			
2. Facility Latitude/Longitude: Latitude (DD/MM/SS): **27 / 37 / 52** Longitude (DD/MM/SS): **80 / 22 / 33**			
3. Governmental Facility Code: **0**	4. Facility Status Code: **A**	5. Facility Major Group SIC Code: **49**	6. Facility SIC(s): **4911**
7. Facility Comment (limit to 500 characters): **See Attachment Part II.**			

Facility Contact

1. Name and Title of Facility Contact: **Mr. Thomas P. Hovanec, Manager, Environmental and Safety Operations**
2. Facility Contact Mailing Address: Organization/Firm: **Tropicana Products, Inc.** Street Address: **1001 13th Street** City: **Bradenton** State: **FL** Zip Code: **34208**
3. Facility Contact Telephone Numbers: Telephone: (**941**) **742 - 2788** Fax: (**941**) **742 - 2698**

Facility Regulatory Classifications

Check all that apply:

1. [ ] Small Business Stationary Source?	[ ] Unknown
2. [X] Major Source of Pollutants Other than Hazardous Air Pollutants (HAPs)?	
3. [ ] Synthetic Minor Source of Pollutants Other than HAPs?	
4. [X] Major Source of Hazardous Air Pollutants (HAPs)?	
5. [ ] Synthetic Minor Source of HAPs?	
6. [X] One or More Emissions Units Subject to NSPS?	
7. [ ] One or More Emission Units Subject to NESHAP?	
8. [ ] Title V Source by EPA Designation?	
9. Facility Regulatory Classifications Comment (limit to 200 characters): **NSPS Subpart DC applies to the standby steam boiler**	

List of Applicable Regulations

Facility emissions covered under existing Title V permit, no additional facility or emissions unit applicable requirements as a result of the proposed change.

B. FACILITY POLLUTANTS

List of Pollutants Emitted

1. Pollutant Emitted	2. Pollutant Classif.	3. Requested Emissions Cap lb/hour	tons/year	4. Basis for Emissions Cap	5. Pollutant Comment

C. FACILITY SUPPLEMENTAL INFORMATION

Supplemental Requirements

1. Area Map Showing Facility Location: [ ] Attached, Document ID: _____ [X] Not Applicable [ ] Waiver Requested
2. Facility Plot Plan: [ ] Attached, Document ID: _____ [X] Not Applicable [ ] Waiver Requested
3. Process Flow Diagram(s): [ ] Attached, Document ID: _____ [X] Not Applicable [ ] Waiver Requested
4. Precautions to Prevent Emissions of Unconfined Particulate Matter: [ ] Attached, Document ID: _____ [X] Not Applicable [ ] Waiver Requested
5. Fugitive Emissions Identification: [ ] Attached, Document ID: _____ [X] Not Applicable [ ] Waiver Requested
6. Supplemental Information for Construction Permit Application: [X] Attached, Document ID Part II [ ] Not Applicable
7. Supplemental Requirements Comment:

Additional Supplemental Requirements for Title V Air Operation Permit Applications

8. List of Proposed Insignificant Activities:
   [ ] Attached, Document ID:_____ [X] Not Applicable

9. List of Equipment/Activities Regulated under Title VI:
   [ ] Attached, Document ID:_____
   [ ] Equipment/Activities On site but Not Required to be Individually Listed
   [X] Not Applicable

10. Alternative Methods of Operation:
    [ ] Attached, Document ID:_____ [X] Not Applicable

11. Alternative Modes of Operation (Emissions Trading):
    [ ] Attached, Document ID:_____ [X] Not Applicable

12. Identification of Additional Applicable Requirements:
    [ ] Attached, Document ID:_____ [X] Not Applicable

13. Risk Management Plan Verification:
    [ ] Plan previously submitted to Chemical Emergency Preparedness and Prevention Office (CEPPO). Verification of submittal attached (Document ID:_____) or previously submitted to DEP (Date and DEP Office:_____)
    [ ] Plan to be submitted to CEPPO (Date required:_____)
    [X] Not Applicable

14. Compliance Report and Plan:
    [ ] Attached, Document ID:_____ [X] Not Applicable

15. Compliance Certification (Hard-copy Required):
    [ ] Attached, Document ID:_____ [X] Not Applicable

III. EMISSIONS UNIT INFORMATION

A separate Emissions Unit Information Section (including subsections A through J 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.

A. GENERAL EMISSIONS UNIT INFORMATION
(All Emissions Units)

Emissions Unit Description and Status

1. Type of Emissions Unit Addressed in This Section: (Check one)

[X] 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.

2. Regulated or Unregulated Emissions Unit? (Check one)

[X] 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.

3. Description of Emissions Unit Addressed in This Section (limit to 60 characters):

Standby 70,000 lb/hr (Steam) Boiler

4. Emissions Unit Identification Number: [ ] No ID
ID: [X] ID Unknown

5. Emissions Unit Status Code:	6. Initial Startup Date:	7. Emissions Unit Major Group SIC Code:	8. Acid Rain Unit?
C	**Feb-01**	**49**	[ ]

9. Emissions Unit Comment: (Limit to 500 Characters)

The standby boiler will be used as a supplementary supply of process steam. The boiler will fire natural gas and no. 2 distillate oil (backup) and is subject to 40 CFR Subpart Dc.

Emissions Unit Control Equipment

1. Control Equipment/Method Description (Limit to 200 characters per device or method):

   Low NO_X Burner - Gas/Oil

2. Control Device or Method Code(s):

Emissions Unit Details

1. Package Unit: **TBD**
   Manufacturer: **TBD** Model Number: **TBD**
2. Generator Nameplate Rating: MW
3. Incinerator Information:
   Dwell Temperature: °F
   Dwell Time: seconds
   Incinerator Afterburner Temperature: °F

B. EMISSIONS UNIT CAPACITY INFORMATION
(Regulated Emissions Units Only)

Emissions Unit Operating Capacity and Schedule

1. Maximum Heat Input Rate:			**99**	mmBtu/hr
2. Maximum Incineration Rate:	lb/hr			tons/day
3. Maximum Process or Throughput Rate:				
4. Maximum Production Rate:				
5. Requested Maximum Operating Schedule:				
	24	hours/day	**7**	days/week
	52	weeks/year	**8,760**	hours/year

6. Operating Capacity/Schedule Comment (limit to 200 characters):

Max heat input will be up to 99 MMBtu/hr, which is the maximum for both natural gas and distillate fuel oil. The actual heat input will vary depending on supplier. The boiler will be operated to supplement steam generated from the cogeneration unit and auxiliary boiler.

C. EMISSIONS UNIT REGULATIONS
(Regulated Emissions Units Only)

List of Applicable Regulations

See Attachment TB-EU1-C for operational requirements	

ATTACHMENT TB-EU1-C

APPLICABLE REQUIREMENTS LISTING

EMISSION UNIT: Temporary Steam Boiler

FDEP Rules:

Stationary Sources-General:

62-210.650	- Circumvention
62-210.700(1)	- Excess Emissions; malfunction; 2-hrs/24-hrs
62-210.700(2)	- Excess Emissions; FFFSG; startup/shutdown
62-210.700(3)	- Excess Emissions; FFFSG; soot blowing/load change
62-210.700(4)	- Excess Emissions; Excludes poor maintenance
62-210.700(6)	- Excess Emissions; reporting

Stationary Sources-Emission Monitoring:

62-297.310(1)	- Test Runs-Mass Emission
62-297.310(2)(b)	- Operating Rate
62-297.310(3)	- Calculation of Emission
62-297.310(4)(a)1.	- Applicable Test Procedures; Sampling time
62-297.310(4)(b)	- Sample Volume
62-297.310(4)(c)	- Required Flow Rate Range-PM
62-297.310(4)(d)	- Calibration
62-297.310(4)(e)	- EPA Method 5
62-297.310(5)	- Determination of Process Variables
62-297.310(6)(a)	- Permanent Test Facilities - general
62-297.310(6)(c)	- Sampling Ports
62-297.310(6)(d)	- Work Platforms
62-297.310(6)(e)	- Access
62-297.310(6)(f)	- Electrical Power
62-297.310(6)(g)	- Equipment Support
62-297.310(7)(a)1.	- Renewal
62-297.310(7)(a)3.	- Permit Renewal Test Required
62-297.310(7)(a)4.b.	- Annual Test
62-297.310(7)(a)5.	- PM exemption if < 400 hrs/yr
62-297.310(7)(a)9.	- FDEP Notification - 15 days
62-297.310(8)	- Test Reports

Stationary Sources - BACT Steam Generators < 250 mmBtu/hr

62-296.406(2)	- Particulate Matter
62-296.406(3)	- Sulfur Dioxide

Federal Rules:

NSPS General:

40 CFR 60.7(b)	- Notification and Recordkeeping (startup/shutdown/malfunction)
40 CFR 60.7(f)	- Notification and Recordkeeping (maintain records)

40 CFR 60.8(c)	- Performance Tests (representative conditions)
40 CFR 60.8(e)	- Performance Tests (test facilities required)
40 CFR 60.8(f)	- Performance Tests (test runs)
40 CFR 60.11(a)	- Compliance (ref. S.60.8 Subpart; other than opacity)
40 CFR 60.11(b)	- Compliance (opacity determined EPA Method 9)
40 CFR 60.11(c)	- Compliance (opacity; excludes startup/shutdown/malfunction)
40 CFR 60.11(d)	- Compliance (maintain air pollution control equipment)
40 CFR 60.11(f)	- Compliance (opacity; ref. S.60.8)
40 CFR 60.12	- Circumvention

NSPS Subpart Dc:

40 CFR 60.42c(d)	- SO_2 Fuel Oil Combustion Limits
40 CFR 60.42c(h)	- Fuel Oil Sulfur Content Certification
40 CFR 60.43c(c)	- Opacity Limits
40 CFR 60.43c(d)	- Opacity Limits during startup, shutdown, or malfunction
40 CFR 60.44c(g)	- Demonstration of compliance with fuel oil sulfur limits
40 CFR 60.45c(a)(7)	- Method 9 testing
40 CFR 60.46c(d)(2)	- Fuel sampling
40 CFR 60.48c(a)	- Notification requirements
40 CFR 60.48c(d)	- Report submittal
40 CFR 60.48c(e)(11)	- Fuel oil supplier certification requirements
40 CFR 60.48c(f)(1)	- Fuel oil supplier certification information
40 CFR 60.48c(g)	- Fuel combustion records

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

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram?	2. Emission Point Type Code: 1	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point): **Exhausts through a single stack.**		
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common:		
5. Discharge Type Code: V	6. Stack Height: 21 feet	7. Exit Diameter: 4 feet
8. Exit Temperature: 500 °F	9. Actual Volumetric Flow Rate: 36,000 acfm	10. Water Vapor: 8.5 %
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): **Stack parameters are typical for the type of trailer-mounted boiler.**		

E. SEGMENT (PROCESS/FUEL) INFORMATION
(All Emissions Units)

Segment Description and Rate: Segment 1 of 2

1. Segment Description (Process/Fuel Type) (limit to 500 characters): **Natural Gas < 100 MMBtu/hr**		
2. Source Classification Code (SCC): **1-02-006-02**	3. SCC Units: **Million Cubic Feet Burned**	
4. Maximum Hourly Rate: **0.097**	5. Maximum Annual Rate: **776**	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit: **1020**
10. Segment Comment (limit to 200 characters): **Maximum hourly based on 1,020 Btu/cf (HHV) for the standby boiler. Maximum annual based on 8,000 hr/yr.**		

Segment Description and Rate: Segment 2 of 2

1. Segment Description (Process/Fuel Type) (limit to 500 characters): **Distillate (No. 2) Fuel Oil**		
2. Source Classification Code (SCC): **1-02-005-02**	3. SCC Units: **1,000 Gallons Burned**	
4. Maximum Hourly Rate: **0.728**	5. Maximum Annual Rate: **1,048.3**	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur: **0.5**	8. Maximum % Ash:	9. Million Btu per SCC Unit: **136**
10. Segment Comment (limit to 200 characters): **Million Btu per SCC unit = 136; based on 6.83 lb/gal; HHV 19,910 Btu/lb, ISO conditions, maximum annual rate based on a maximum of 1,440 hours of oil firing per year.**		

F. EMISSIONS UNIT POLLUTANTS
(All Emissions Units)

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
PM			
SO_2			EL
NO_x	024		EL
CO			EL
PM_{10}			

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units - Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: **PM**	2. Total Percent Efficiency of Control:
3. Potential Emissions: **1.5** lb/hour **1.7** tons/year	4. Synthetically Limited? [X]
5. Range of Estimated Fugitive Emissions: [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year	
6. Emission Factor: Reference: **Vendor; Golder 2000.**	7. Emissions Method Code: **2**
8. Calculation of Emissions (limit to 600 characters): **See Attachment Part II.**	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): **Lb/hr based on oil firing. TPY based on the maximum possible boiler operation of 6,160 hr/yr gas firing and 1,440 hr/yr oil firing.**	

Allowable Emissions Allowable Emissions 1 of 2

1. Basis for Allowable Emissions Code: **OTHER**	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: **VE <20% opacity**	4. Equivalent Allowable Emissions: **1.5** lb/hour **1.1** tons/year
5. Method of Compliance (limit to 60 characters): **EPA Method 9**	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): **Oil firing, 1,440 hr/yr. See Attachment Part II.**	

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units - Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: **PM**	2. Total Percent Efficiency of Control:

3. Potential Emissions: **1.5** lb/hour **1.7** tons/year	4. Synthetically Limited? [**X**]
5. Range of Estimated Fugitive Emissions: [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year	
6. Emission Factor: Reference: **Vendor; Golder 2000.**	7. Emissions Method Code: **2**

8. Calculation of Emissions (limit to 600 characters):

See Attachment Part II.

9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):

Lb/hr based on oil firing. TPY based on the maximum possible boiler operation of 6,160 hr/yr gas firing and 1,440 hr/yr oil firing.

Allowable Emissions Allowable Emissions 2 of 2

1. Basis for Allowable Emissions Code: **OTHER**	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: **VE < 10% opacity**	4. Equivalent Allowable Emissions: **0.2** lb/hour **0.8** tons/year

5. Method of Compliance (limit to 60 characters):

EPA Method 9

6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):

Gas Firing; 8,000 hr/yr. See Attachment Part II.

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units - Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: SO_2	2. Total Percent Efficiency of Control:
3. Potential Emissions: 29.7 lb/hour 22.3 tons/year	4. Synthetically Limited? [X]
5. Range of Estimated Fugitive Emissions: [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year	
6. Emission Factor: Reference: Vendor; Golder 2000.	7. Emissions Method Code: 2
8. Calculation of Emissions (limit to 600 characters): See Attachment Part II.	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): Lb/hr based on oil firing. TPY based on the maximum possible boiler operation of 6,160 hr/yr gas firing and 1,440 hr/yr oil firing.	

Allowable Emissions Allowable Emissions 1 of 2

1. Basis for Allowable Emissions Code: OTHER	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: 0.5% Sulfur Oil maximum	4. Equivalent Allowable Emissions: 29.7 lb/hour 21.4 tons/year
5. Method of Compliance (limit to 60 characters): Fuel Sampling	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): Oil Firing; 1,440 hr/yr. Average sulfur content is 0.3% sulfur. See Attachment Part II.	

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units - Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: SO_2	2. Total Percent Efficiency of Control:
3. Potential Emissions: 29.7 lb/hour 22.3 tons/year	4. Synthetically Limited? [X]
5. Range of Estimated Fugitive Emissions: [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year	
6. Emission Factor: Reference: Vendor; Golder 2000.	7. Emissions Method Code: 2
8. Calculation of Emissions (limit to 600 characters): See Attachment Part II.	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): Lb/hr based on oil firing. TPY based on the maximum possible boiler operation of 6,160 hr/yr gas firing and 1,440 hr/yr oil firing.	

Allowable Emissions Allowable Emissions 2 of 2

1. Basis for Allowable Emissions Code: OTHER	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: See Comment	4. Equivalent Allowable Emissions: 0.3 lb/hour 1.2 tons/year
5. Method of Compliance (limit to 60 characters): Pipeline Natural Gas	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): Pipeline natural gas, 1 g/100 cf, 8,000 hr/yr, See Attachment Part II.	

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units - Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: **NO_X**	2. Total Percent Efficiency of Control:
3. Potential Emissions: **12.9** lb/hour **39.8** tons/year	4. Synthetically Limited? [**X**]
5. Range of Estimated Fugitive Emissions: [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year	
6. Emission Factor: Reference: **Vendor; Golder 2000.**	7. Emissions Method Code: **2**
8. Calculation of Emissions (limit to 600 characters): **See Attachment Part II.**	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): **Lb/hr based on oil firing. TPY based on the maximum possible boiler operation of 6,160 hr/yr gas firing and 1,440 hr/yr oil firing.**	

Allowable Emissions Allowable Emissions 1 of 2

1. Basis for Allowable Emissions Code: **OTHER**	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: **0.13 lb/MMBtu**	4. Equivalent Allowable Emissions: **12.9** lb/hour **9.3** tons/year
5. Method of Compliance (limit to 60 characters): **Manufacturer Certification**	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): **Annual Allowable Emissions based on 1,440 hr/yr. See Attachment Part II.**	

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units - Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: **NO_X**	2. Total Percent Efficiency of Control:

3. Potential Emissions: **12.9** lb/hour **39.8** tons/year	4. Synthetically Limited? [**X**]

5. Range of Estimated Fugitive Emissions:
[ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year

6. Emission Factor: Reference: **Vendor; Golder 2000.**	7. Emissions Method Code: **2**

8. Calculation of Emissions (limit to 600 characters):

See Attachment Part II.

9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):

Lb/hr based on oil firing. TPY based on the maximum possible boiler operation of 6,160 hr/yr gas firing and 1,440 hr/yr oil firing.

Allowable Emissions Allowable Emissions 2 of 2

1. Basis for Allowable Emissions Code: **OTHER**	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: **0.1 lb/MMBtu**	4. Equivalent Allowable Emissions: **9.9** lb/hour **39.6** tons/year

5. Method of Compliance (limit to 60 characters):

Manufacturer Certification

6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):

Annual Allowable Emissions based on 8,000 hr/yr. See Attachment Part II.

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units - Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: **CO**	2. Total Percent Efficiency of Control:
3. Potential Emissions: **14.9** lb/hour **59.4** tons/year	4. Synthetically Limited? [**X**]
5. Range of Estimated Fugitive Emissions: [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year	
6. Emission Factor: Reference:	7. Emissions Method Code: **2**
8. Calculation of Emissions (limit to 600 characters): **See Attachment Part II.**	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): **Lb/hr based on oil firing. TPY based on the maximum possible boiler operation of 8,000 hr/yr gas firing.**	

Allowable Emissions Allowable Emissions 1 of 2

1. Basis for Allowable Emissions Code: **OTHER**	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: **0.15 lb/MMBtu**	4. Equivalent Allowable Emissions: **14.9** lb/hour **10.7** tons/year
5. Method of Compliance (limit to 60 characters): **Manufacturer Certification**	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): **Oil firing for 1,440 hr/yr. See Attachment Part II.**	

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units - Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: **CO**	2. Total Percent Efficiency of Control:
3. Potential Emissions: **14.9** lb/hour **59.4** tons/year	4. Synthetically Limited? [**X**]
5. Range of Estimated Fugitive Emissions: [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year	
6. Emission Factor: Reference:	7. Emissions Method Code: **2**
8. Calculation of Emissions (limit to 600 characters): **See Attachment Part II.**	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): **Lb/hr based on oil firing. TPY based on the maximum possible boiler operation of 8,000 hr/yr gas firing.**	

Allowable Emissions Allowable Emissions 2 of 2

1. Basis for Allowable Emissions Code: **OTHER**	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: **0.15 lb/MMBtu**	4. Equivalent Allowable Emissions: **14.9** lb/hour **59.4** tons/year
5. Method of Compliance (limit to 60 characters): **Manufacturer Certification**	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): **Based on 8,000 hr/yr gas firing. See Attachment Part II.**	

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units - Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: **PM_{10}**	2. Total Percent Efficiency of Control:
3. Potential Emissions: **1.5** lb/hour **1.7** tons/year	4. Synthetically Limited? [X]
5. Range of Estimated Fugitive Emissions: [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year	
6. Emission Factor: Reference: **Vendor; Golder 2000.**	7. Emissions Method Code: **2**
8. Calculation of Emissions (limit to 600 characters): **See Attachment Part II.**	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): **Lb/hr based on oil firing. TPY based on the maximum possible boiler operation of 6,160 hr/yr gas firing and 1,440 hr/yr oil firing.**	

Allowable Emissions Allowable Emissions 1 of 2

1. Basis for Allowable Emissions Code: **OTHER**	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: **VE < 20% opacity**	4. Equivalent Allowable Emissions: **1.5** lb/hour **1.1** tons/year
5. Method of Compliance (limit to 60 characters): **EPA Method 9**	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): **Oil firing, 1,440 hr/yr. See Attachment Part II.**	

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units - Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: **PM_{10}**	2. Total Percent Efficiency of Control:
3. Potential Emissions: **1.5** lb/hour **1.7** tons/year	4. Synthetically Limited? [**X**]
5. Range of Estimated Fugitive Emissions: [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year	
6. Emission Factor: Reference: **Vendor; Golder 2000.**	7. Emissions Method Code: **2**
8. Calculation of Emissions (limit to 600 characters): **See Attachment Part II.**	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): **Lb/hr based on oil firing. TPY based on the maximum possible boiler operation of 6,160 hr/yr gas firing and 1,440 hr/yr oil firing.**	

Allowable Emissions Allowable Emissions **2** of **2**

1. Basis for Allowable Emissions Code: **OTHER**	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: **VE < 10% opacity**	4. Equivalent Allowable Emissions: **0.2** lb/hour **0.8** tons/year
5. Method of Compliance (limit to 60 characters): **EPA Method 9**	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): **Gas firing; 8,000 hr/yr. See Attachment Part II.**	

H. VISIBLE EMISSIONS INFORMATION
(Only Regulated Emissions Units Subject to a VE Limitation)

Visible Emissions Limitation: Visible Emissions Limitation 1 of 1

1. Visible Emissions Subtype: **VE20**	2. Basis for Allowable Opacity: [X] Rule [ ] Other
3. Requested Allowable Opacity: Normal Conditions: **20** % Exceptional Conditions: **100** % Maximum Period of Excess Opacity Allowed: **60** min/hour	
4. Method of Compliance: **Annual VE Test EPA Method 9**	
5. Visible Emissions Comment (limit to 200 characters): **VE of 20% proposed for distillate oil firing. VE of 10% proposed for gas firing. Excess opacity based on Rule 62-210.700.**	

I. CONTINUOUS MONITOR INFORMATION
(Only Regulated Emissions Units Subject to Continuous Monitoring)

Continuous Monitoring System: Continuous Monitor _____ of _____

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	[ ] Rule [ ] 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):	

J. EMISSIONS UNIT SUPPLEMENTAL INFORMATION
(Regulated Emissions Units Only)

Supplemental Requirements

1. Process Flow Diagram
   [ ] Attached, Document ID: _____ [X] Not Applicable [ ] Waiver Requested

2. Fuel Analysis or Specification
   [ ] Attached, Document ID: _____ [X] Not Applicable [ ] Waiver Requested

3. Detailed Description of Control Equipment
   [ ] Attached, Document ID: _____ [X] Not Applicable [ ] Waiver Requested

4. Description of Stack Sampling Facilities
   [ ] Attached, Document ID: _____ [X] Not Applicable [ ] Waiver Requested

5. Compliance Test Report
   [ ] Attached, Document ID: _____
   [ ] Previously submitted, Date: _____
   [X] Not Applicable

6. Procedures for Startup and Shutdown
   [ ] Attached, Document ID: _____ [X] Not Applicable [ ] Waiver Requested

7. Operation and Maintenance Plan
   [ ] Attached, Document ID: _____ [X] Not Applicable [ ] Waiver Requested

8. Supplemental Information for Construction Permit Application
   [X] Attached, Document ID: **Part II** [ ] Not Applicable

9. Other Information Required by Rule or Statute
   [ ] Attached, Document ID: _____ [X] Not Applicable

10. Supplemental Requirements Comment:

Additional Supplemental Requirements for Title V Air Operation Permit Applications

11. Alternative Methods of Operation
[ ] Attached, Document ID:_____ [ ] Not Applicable

12. Alternative Modes of Operation (Emissions Trading)
[ ] Attached, Document ID:_____ [ ] Not Applicable

13. Identification of Additional Applicable Requirements
[ ] Attached, Document ID:_____ [ ] Not Applicable

14. Compliance Assurance Monitoring Plan
[ ] Attached, Document ID:_____ [ ] Not Applicable

15. Acid Rain Part Application (Hard-copy Required)

[ ] Acid Rain Part - Phase II (Form No. 62-210.900(1)(a))
Attached, Document ID:_____

[ ] Repowering Extension Plan (Form No. 62-210.900(1)(a)1.)
Attached, Document ID:_____

[ ] New Unit Exemption (Form No. 62-210.900(1)(a)2.)
Attached, Document ID:_____

[ ] Retired Unit Exemption (Form No. 62-210.900(1)(a)3.)
Attached, Document ID:_____

[ ] Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.)
Attached, Document ID:_____

[ ] Phase NOx Averaging Plan (Form No. 62-210.900(1)(a)5.)
Attached, Document ID:_____

[ ] Not Applicable

PART II

SUPPORTING INFORMATION

1.0 INTRODUCTION

Tropicana Products, Inc. is proposing to install and operate one standby steam boiler at the existing Bradenton Citrus Processing Plant. The steam boiler will operate to supplement steam generated by the existing auxiliary boiler and combined cycle combustion turbine. The standby boiler will be operated when either of the existing steam sources are at reduced operating loads or not operating. The boiler will be a trailer-mounted boiler that will be rented as necessary to provide supplemental steam. The standby boiler will be fired primarily with pipeline quality natural gas and distillate fuel oil will be used as a backup.

1.1 EXISTING FACILITY AND PROPOSED STANDBY STEAM BOILER

The Tropicana facility is located at 1001 13th Avenue East, Bradenton, Florida. The existing industrial complex includes glass manufacturing, and citrus processing that includes juice extracting, processing, packaging, warehousing, and distribution. Fruit is graded and carried to an extractor room where the juice is removed and pumped to either carton filling, glass filling, plastic filling, block freezing, aseptic storage or to evaporators for concentrate production.

The plant contains three citrus feed mills, four citrus pellet mills (including two pellet coolers and associated pellet, bulk cooling reels, and Ross coolers), two glass plants, cogeneration facility (combustion turbine, heat recovery steam generator (HRSG), duct burner, auxiliary boiler, sanitary process steam boiler (used to produce 5-fold citrus oil), and a wastewater treatment system that includes a package steam boiler and an anaerobic reactor with a biogass flare.

The proposed standby steam boiler will be rented on a temporary basis as needed for supplying steam to supplement or replace the steam generated by the auxiliary boiler and cogeneration unit. The standby boiler will have a nominal steam rating of 70,000 pounds (lb) of steam per hour. A maximum heat input of 99 million British thermal units per hour (MMBtu/hr) is proposed to envelope the possible boilers that can be rented. The fuel will be primarily pipeline-quality natural gas with No. 2 fuel oil as a backup fuel. The fuel oil will contain a maximum of 0.5 percent sulfur and an average of 0.3 percent sulfur.

1.2 STANDBY STEAM BOILER EMISSION ESTIMATION

The estimated hourly and annual criteria pollutant emissions from the standby steam boiler are provided in Table 1. The boiler emissions are based on a total heat input rate of 99.0 MMBtu/hr and a total fuel usage rate of 97,059 standard cubic feet per hour of pipeline quality natural gas or 728 gallons per hour of No. 2 fuel oil with 0.05-percent sulfur. Actual hourly emissions are expected to be lower since the capacity of the boilers available for this purpose have a heat input rate of less than 99 mmBtu/hr.

The standby boiler emissions are based on 8,000 hours per year of operation when firing natural gas. Up to 1,440 hours per year (60 days) of distillate fuel oil firing is being proposed as the back-up fuel requirements. Specific vendor information for the standby steam boiler is provided in Attachment A.

The operation of the boiler is proposed to be limited by the equivalent heat input of operating 8,000 hr/yr on natural gas of 792,000 mmBtu/yr (99 mmBtu/hr times 8,000 hr/yr). Distillate oil usage is proposed as a backup fuel up to an equivalent of 1,440 hr/yr or 142,560 mmBtu/yr (99 mmBtu/hr times 1,440 hr/yr). In the event distillate oil is burned, the maximum amount of gas authorized would be decreased by a factor of 1.3. For example, if 50,000 mmBtu/yr of distillate oil were burned, then the annual amount of gas authorized would decrease by 65,000 mmBtu/yr (1.3 times 50,000 mmBtu/yr). This schedule is being proposed to make the NO_x emissions equivalent and less than 40 TPY (i.e., the PSD Threshold; see Section 1.3).

1.3 APPLICABLE REQUIREMENTS AND PERMITTING CONDITIONS

A modification is defined in Rule 62-210.200 Florida Administrative Code (F.A.C.) as any physical change in, or a change in the method of operation of, or addition to a facility which would result in an increase in the actual emissions of any air pollutant subject to regulation under the Clean Air Act. A modification to a major source of air pollution, such as the Tropicana Bradenton Citrus Processing Plant, may be subject to review under the

Department's Prevention of Significant Deterioration (PSD) rules codified in Rule 62-212.400 F.A.C.

The proposed fuel use limitations will limit the potential emission rates for the standby steam boiler to be less than the PSD significant emission rates in Table 62-212.400-2 in Rule 62-212.400 F.A.C. Therefore, PSD review would not apply. The Tropicana Bradenton facility will record the fuel use and hours of operation for the standby boiler to demonstrate compliance.

The standby boiler will also be subject to specific standards in 62-296.406, F.A.C., applicable to fossil fuel steam generators with less than 250 MMBtu/hr heat input. The maximum heat input rate of the proposed standby steam boiler is 99 MMBtu/hr and therefore will be subject to this rule. F.A.C. 62-296.406(1) requires that visible emissions from the standby boiler will be limited to 20-percent opacity, except for either one 6-minute period per hour during which opacity shall not exceed 27 percent, or one 2-minute period per hour during which opacity shall not exceed 40 percent. Method 9 will be used demonstrate compliance with the opacity limits on an annual basis. Rules 62-296.406(2) and (3) require that best achievable control technology (BACT) for PM and SO_2 be applied to the standby steam boiler. The BACT requirements and analysis are presented in Section 2.0.

The standby steam boiler will be subject to 40 CFR 60, Subpart Dc, *New Source Performance Standards for Small Industrial-Commercial-Institutional Steam Generating Units*. According to the rule, a boiler less than 100 MMBtu/hr may emit no more than 0.5 pounds/MMBtu of SO_2, or as an alternative, must burn fuel oil with a maximum sulfur content of 0.50 percent. In addition, the boiler will be subject to a 20-percent opacity limitation, except up to 6 minutes per hour, the opacity must not exceed 27 percent. The standby boiler will comply with these requirements by testing the fuel oil sulfur content and performing an annual Method 9 test for opacity.

2.0 BACT ANALYSIS

2.1 REQUIREMENTS

The control technology review requirements of the state regulations require that all applicable state emissions-limiting standards are met, and that BACT be applied to control emissions from the source. Rule 62-296.406, F.A.C., requires BACT for PM and SO_2. BACT is defined in Rule 62-210.200(42) as:

> An emission limitation, including a visible emissions standard, based on the maximum degree of reduction of each pollutant emitted which the Department, 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 (including fuel cleaning or treatment or innovative fuel combustion techniques) for control of each such pollutant. If the Department determines that technological or economic limitations on the application of measurement methodology to a particular part of an emissions unit or facility would make the imposition of an emission standard infeasible, a design, equipment, work practice, operational standard or combination thereof, may be prescribed instead to satisfy the requirement for the application of BACT. Such standard shall, to the degree possible, set forth the emissions reductions achievable by implementation of such design, equipment, work practice or operation.

The BACT requirements are intended to ensure that the control systems incorporated in the design of a proposed facility reflect the latest in control technologies used in that particular industry and take into consideration existing and future air quality in the vicinity of the proposed facility. BACT must, as a minimum, demonstrate compliance with NSPS for a source (if applicable). An evaluation of the air pollution control techniques and systems, including a cost-benefit analysis of alternative control technologies capable of achieving a higher degree of emission reduction than the proposed control technology, is required. The cost-benefit analysis requires the documentation of the materials, energy, and economic penalties associated with the proposed and alternative control systems, as well as the environmental benefits derived from these systems. A decision on BACT is to be based on sound judgement, balancing environmental benefits with energy, economic, and other impacts (EPA, 1978).

2.2 PROPOSED BACT FOR SO_2

There are no technically feasible methods for controlling the emissions of SO_2 from small steam boilers other than the inherent quality of the fuel. Therefore, the proposed BACT for SO_2 emissions from the standby steam boiler will be based on burning pipeline quality natural gas and very low sulfur fuel oil. Tropicana Bradenton will use pipeline quality natural gas as the primary fuel with a sulfur content of 1 grain per 100 cubic feet. Distillate fuel oil will be used as a backup fuel with a maximum sulfur content of 0.5 percent, which is currently authorized for the auxiliary boiler.

2.3 PROPOSED BACT FOR PM

PM emissions from the standby steam boiler are estimated to be less than 2 TPY. Due to the low emissions, no control equipment is recommended for PM. The proposed BACT is to use No. 2 fuel oil with a maximum sulfur content of 0.5 percent. It is proposed that no further particulate controls are necessary for the proposed standby boiler.

Table 1. Stand-By Boiler Criteria Emissions (nominal 70,000 lb/hr steam)

	Gas Firing		Oil Firing		Maximum Tons per year[b]	
	(lb/MMBtu)[a]	(lb/hr)	(lb/MMBtu)[a]	(lb/hr)	(Case A)	(Case B)
PM as TSP	0.002	0.20	0.015	1.49	0.79	1.68
PM10	0.002	0.20	0.015	1.49	0.79	1.68
NO_x	0.1	9.90	0.13	12.87	39.60	39.76
SO2	0.003	0.30	0.3	29.70	1.19	22.30
CO	0.15	14.85	0.15	14.85	59.40	56.43
VOCs	0.004	0.40	0.004	0.40	1.58	1.50

Heat Input:

Gas (MMBtu/hr) = 99 MMBtu/hr - Gas

Oil (MMBtu/hr) = 99 MMBtu/hr - Oil

[a] Vendor provided values

[b] Maximim emission cases:

	Number of Hours for Operation	
Operation	Gas Only	Gas and Oil
100 % Load - Gas	8,000	6,160
100 % Load - Oil	0	1,440
Total hours	8,000	7,600

ATTACHMENT A

MANUFACTURER INFORMATION FOR THE STANDBY STEAM BOILER (EXAMPLE OF TYPICAL TRAILER-MOUNTED BOILER)

Indeck Power Equipment Company
1111 S. Willis Avenue
Wheeling, IL 60090

To:	**Steve Maltby**
Company:	**Golder Ass.**
Phone:	**352-336-5600**
Fax:	**352-336-6603**
From:	**John P. Sullivan**
Title:	**National Sales Engineer**
Phone:	**(847) 541-8300**
Fax:	**(847) 541-9984**
E-Mail:	jsullivan45@compuserve.com
Date:	**10/25/00**
Total Pages Sent:	**1**

RE: 70,000 PPH Rental Boiler Emissions

RE: INDECK QUOTE DATED 8/9/00

NATURAL GAS :		**NO. 2 OIL:**	
NOX:	84 PPM	NOX:	101 PPM
CO:	200 PPM	CO:	200 PPM
PARTICULATE:	.01 LBS/MM/BTU	PARTICULATE:	.05 LBS/MM/BTU
VOC:	.004 LBS/MM/BTU	VOC:	.004 LBS/MM/BTU
SO2:	.003 LBS/MM/BTU	SO2	.164 LBS/MM/BTU
SOX:	.001 LBS/MM/BTU	SOX:	.151 LBS/MM/BTU

INDECK POWER EQUIPMENT COMPANY • 1111 SOUTH WILLIS AVENUE • WHEELING, ILLINOIS 60090-5841
847/541-8300 • TELEX 28-3544 • FAX 847/541-9984

INDECK®

August 9, 2000

Facsimile No. 941-742-2900
Tropicana
1001 – 13th Avenue East
Bradenton, Florida 34208

Attention: Mr. Tom Williams
Phone: 941-742-2740

Reference: Telephone Conversation of August 9, 2000

Subject: Rental Boiler

Dear Mr. Williams:

In accordance with your request, I am pleased to provide the following for your review and consideration.

70,000 PPH Trailer Mounted Boiler

One (1) 70,000 lb./hr. Indeck trailer mounted steam system, designed and built to the ASME Power Boiler Code for 350 psig design pressure with an operating pressure range of 125-335 psig. The unit is arranged to fire either natural gas requiring regulated gas pressure of 10 psig at the trailer connection or #2 fuel oil with either fuel requiring a gas pilot. The unit is complete with the manufacturer's standard trim, Low NOx burner, electric single point positioning combustion controls, Industrial Risk Insurance (IRI) approved fuel trains, automatic relay type non-recycling burner management system and a forced draft fan, coupled to a 75 HP, TEFC drive motor requiring 480 volts, 3-phase, 60 Hertz power. The following list of auxiliary equipment is shipped loose on the trailer for field mounting by others.,

a. 6 ft. high stack & transition assembly.
b. 8" - 300 psig flanged steam non-return valve.
c. ASME safety relief valves set at 350 psig.
d. Bottom drum tandem blowdown valves.
e. Flanged upper forced draft fan housing.

The above 70,000 lb./hr. steam boiler is mounted on a 52 ft. long specially designed trailer.

INDECK

Your net price for the above described trailer mounted boiler system is $24,000.00/month, f.o.b. Wheeling, Illinois.

Estimated freight charges to Bradenton, Florida and return are $4,400.00 each way.

The above mobile steam system is currently in-stock and available for shipment. All equipment is offered subject to prior rental/sale.

After the equipment has been properly installed by others and is ready for operation, we do require that an Indeck Service Technician supervise the initial start-up by your operators and train your operating personnel. This service will be billed at $750.00/8 hour day (straight time) plus travel and expenses for the Engineer on a portal to portal basis. Expenses will be billed at cost plus 15% supported by third party receipts.

WARRANTY

After start-up, should any failures of the following types occur, they will be repaired at **no cost** to you.

Bearings	Refractory
Blowers	Safety Valves
Controls	Tubes
Electric Motors	Valves
Gauges	Water Columns
Leaking Gaskets	Wiring

The above guarantee includes all parts and labor and extends throughout the entire rental period.

Also, a full rental credit will be allowed for all down days.

Users are responsible for:

A. Returning defective part(s) within 30 days of shipment of warranty part(s).
B. Indeck Power Equipment Company requires that ABMA guidelines are maintained within the steam drum of our boilers.
C. Proper care and maintenance of the equipment
D. Providing competent operators

INDECK

August 9, 2000

E. A temporary shelter to protect the burner and controls from the environment. The shelter must be substantial enough to protect from rain and freezing temperatures. If necessary, a heater needs to be supplied to keep the burner and controls above 32 Deg. Some areas of the country may require a complete shelter depending upon your location.

Please note that the above quoted prices do not include any taxes, permits, fees, duties, etc.

I have enclosed a customer connection drawing and specifics on the unit quoted herein for your review.

Thank you for the opportunity of quoting our equipment and after review of the above, should you have any questions or require additional information, please feel free to contact me at your convenience.

Very truly yours,

INDECK POWER EQUIPMENT COMPANY

John P. Sullivan
Sales Engineer

JPS/mg
Enclosures

70,000 PPH Rental Boiler Specifications

General Information:
One (1) 70,000 PPH trailer mounted watertube steam boiler, designed to the ASME Code for 350 psig design pressure, arranged for natural gas or #2 oil firing, complete with manufacturer's standard boiler trim, Low NO_x burner, and combustion controls.

Boiler Information:	
Design Pressure	350 PSI
Maximum Operating Pressure	325 PSI
Minimum Operating Pressure	125 PSI
Gas Fired Requirements:	
Gas Consumption (100%)	88,435 SCFH
Gas Pressure Required at Connection	
Must be Regulated to	10-12 PSI
Electrical Amps on Gas Firing	110
Emissions Information	Upon Request
Low NO_x Burner	All Units
Oil Fired Requirements :(#2 Oil Only)	
Oil Consumption (100%)	606 GPH
Minimum Oil Pressure At Connection	Positive
Maximum Oil Pressure At Connection	30 PSI
Pilot Gas Pressure Required for Oil Start-up	2.0 PSI
Oil Atomization (Air)	
Minimum Air Pressure	80 PSI
Maximum Air Pressure	120 PSI
Air Consumption	35 SCFM
Min. Capacity Req'd for Steam Atomization	25%
Oil Atomization (Steam) - Steam Pressure Required	125 PSI
Electrical Amps on Oil Firing	125
Emissions Information	Upon Request with Supplied Fuel Analysis
Low NO_x Burner	All Units
Feedwater Requirements:	
Minimum Feedwater Pressure	60-75 PSI Above Operating Pressure
Maximum Feedwater Pressure	100 PSI Above Operating Pressure
Minimum Feedwater Temperature	240 Deg. F.
Electrical Requirements - Single Point Connection:	
Electrical Amps- Gas Fired	110
Electrical Amps- Oil Fired	125
F.D. Fan	75 HP
Oil Pump (#2 Oil Only)	2 HP
Voltage	480V/3-Phase
Motor Starter	Included
Transformer (480 to 120)	Included
Instrument Quality Compressed Air Required for Feedwater Control Valve:	
Minimum Air Pressure	50 PSI
Maximum Air Pressure	120 PSI

Auxiliary Equipment to be Field Mounted by Others:

(1) 6 ft. high stack and transition assembly.
(1) 8" - 300 psig flanged steam non-return valve.
(2) Bottom drum tandem blowdown valves.
(2) ASME safety relief valves set at 350 psi.
(1) Flanged upper forced draft fan housing.

Dimensional Information:	
Trailer Width	10' - 6"
Trailer Length	52 Ft.
Shipping Weight	89,750 lbs.
Operating Weight	107,350 lbs.
Stack Diameter	48"

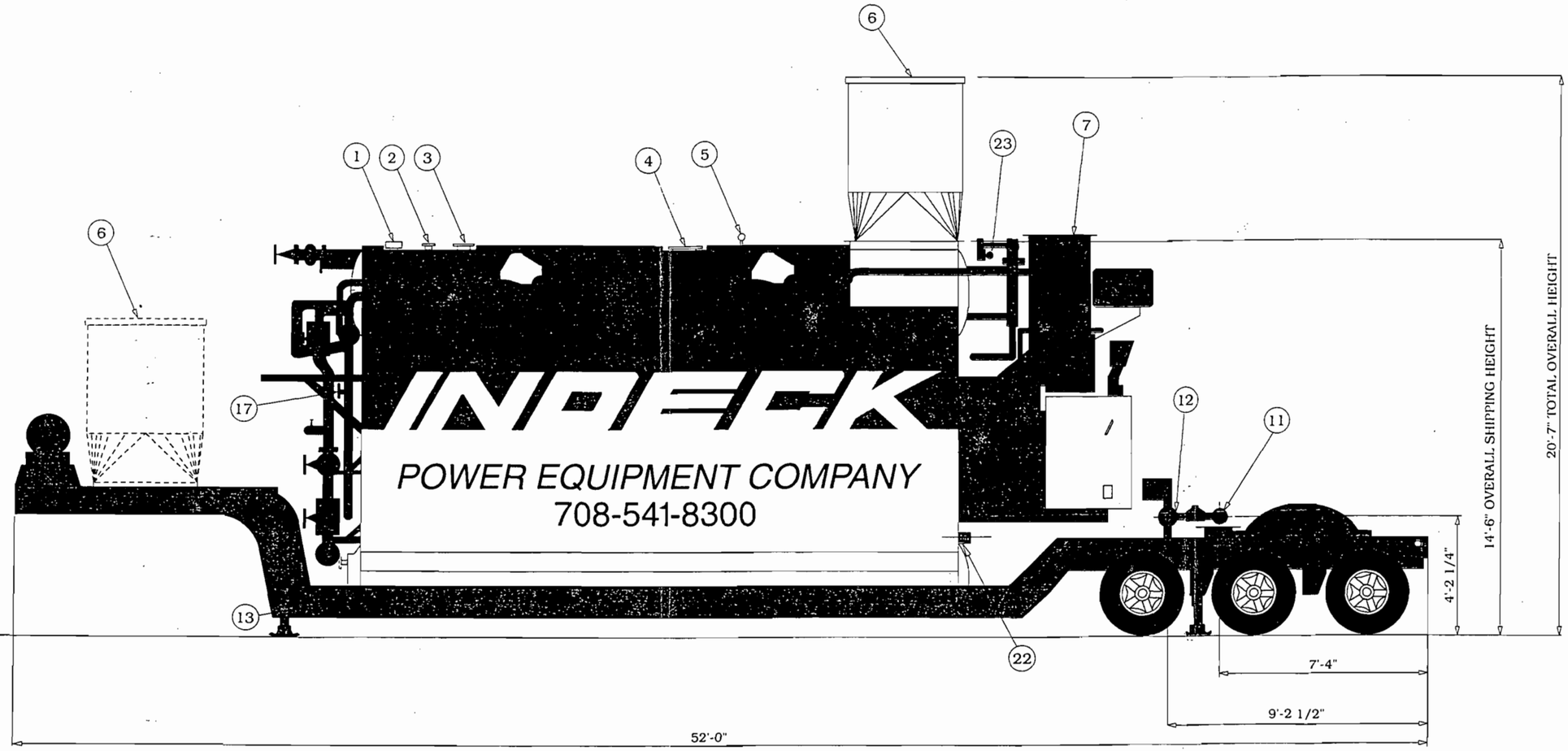
INDECK
INDECK POWER EQUIPMENT CO.
1111 S. Willis Avenue
Wheeling, Illinois 60090
(708) 541-8300
(800) 446-3325
FAX: (708) 541-9984

For further information, see customer connection drawing or contact Indeck at 1-708-541-8300.

UNIT REFERENCE:

87L 14-10272
88L 14-10273
89L 14-10274
90L 14-10275
91L 14-10276
92L 14-10277

70,000 PPH RENTAL BOILER



INSTALLATION SERVICE CONNECTIONS

1. 3"-300# SAFETY VALVE CONNECTION (SAFETY VALVE MUST BE REMOVED FOR TRANSPORT)
2. 3"-300# SAFETY VALVE CONNECTION (SAFETY VALVE MUST BE REMOVED FOR TRANSPORT)
3. 3"-300# SAFETY VALVE CONNECTION (SAFETY VALVE MUST BE REMOVED FOR TRANSPORT) (& FOR LOW PRESSURE OPERATION ONLY)
4. 8"-300 # MAIN STEAM OUTLET CONNECTION
5. 1" NPT DRUM VENT / AUX CONNECTION
6. FLUE GAS STACK AND TRANSITION (REMOVED FOR TRANSPORT)
7. UPPER F.D. FAN HOUSING (REMOVABLE TO PROVIDE ADDITIONAL SHIPPING CLEARANCE (FLANGED))
8. 1 1/2"-300# AUX ATOMIZING AIR / STEAM CONNECTION (LOCATED BEHIND CABINET)
9. 1/2" NPT PILOT GAS CONNECTIONS (NAT OR PROPANE) (LOCATED BEHIND CABINET)
10. 3/4" NPT FUEL OIL RETURN CONNECTION (LOCATED ON OPPOSITE SIDE OF TRAILER)
11. 1-1/2"-NPT FUEL OIL SUPPLY CONNECTION (LOCATED ON OPPOSITE SIDE OF TRAILER)
12. 4"-150 # FUEL GAS CONNECTION
13. 1-1/2"-300 # BLOW OFF CONNECTION
14. 1-1/2"-300 # LOWER DRUM HEATING COIL CONNECTIONS
15. 3/4" NPT CHEMICAL FEED CONNECTION
16. 1" CONTINUOUS BLOWDOWN CONNECTION (LOCATED ON OPPOSITE SIDE OF TRAILER)
17. 2-1/2"-300 # FEEDWATER SUPPLY CONNECTION
18. 460/60/3 POWER SUPPLY 150 AMPS
19. 3"-300# SOOT BLOWER STEAM SUPPLY CONNECTION
20. 2"-300# CHEMICAL CLEANING CONNECTION
21. 1" NPT FURNACE PRESS CONNECTION
22. WASHOUT
23. 1/4" NPT INSTRUMENT AIR CONNECTION

DESIGN DATA

OVERALL LENGTH:	52'-0"
OVERALL WIDTH:	10'-6"
NET WEIGHT (INCL TRAILER):	89.750 LBS
CONTINUOUS CAPACITY:	70,000 PPH
DESIGN PRESSURE:	350 PSIG
FEEDWATER TEMPERATURE:	220 DEG F
FURNACE VOLUME:	854 CU. FT.
CONVECTION HEATING SURFACE:	3647 SQ. FT.
RADIANT HEATING SURFACE:	620 SQ. FT.
TOTAL HEATING SURFACE:	4267 SQ. FT. (A.S.M.E.)
GAS SUPPLY PRESSURE	10 PSIG (REGULATED BY CUSTOMER)
OIL SUPPLY PRESSURE	30 PSIG FLOODED MAX.
FEED WATER PRESSURE	75-100 PSIG ABOVE OPERATING PRESSURE
INSTRUMENT AIR PRESSURE	50 PSIG MIN.

NOTE 1: A NATURAL GAS OR PROPANE PILOT IS REQUIRED FOR OIL

NOTE 2: PROVIDE ADEQUATE WEATHER PROTECTION FOR BURNER, CONTROLS AND PERSONNEL

C.F. NO. TRAILER\70-350

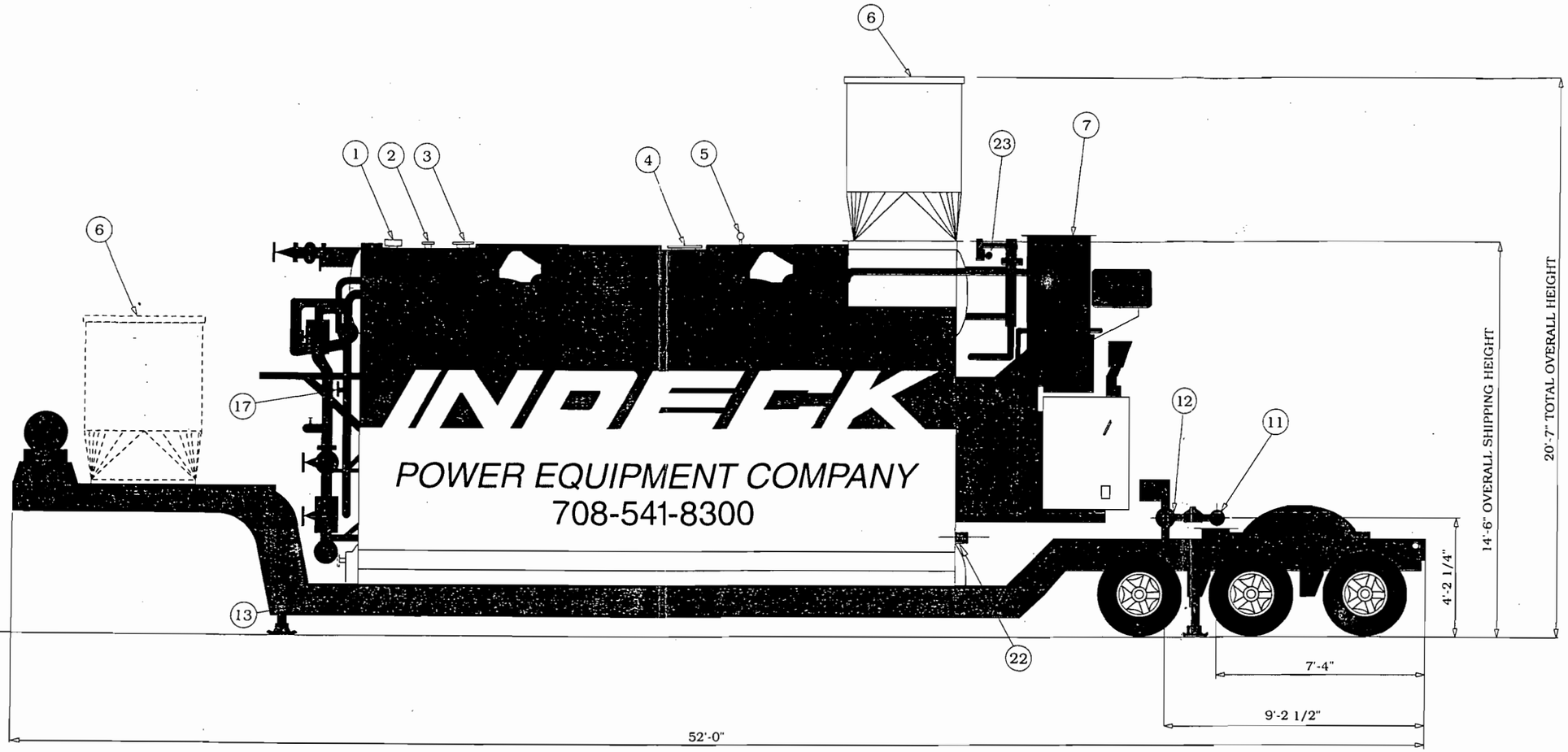
70,000 PPH RENTAL BOILER

INDECK POWER EQUIPMENT COMPANY
1111 WILLIS AVENUE, WHEELING, ILLINOIS 60090

UNIT REFERENCE:

87L 14-10272
88L 14-10273
89L 14-10274
90L 14-10275
91L 14-10276
92L 14-10277

70,000 PPH RENTAL BOILER



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C.F. NO. TRAILER\70-350

70,000 PPH RENTAL BOILER

INDECK POWER EQUIPMENT COMPANY
1111 WILLIS AVENUE, WHEELING, ILLINOIS 60090

7099 3400 0000 1453 2719

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

Article Sent To:
Mr. Donald Antenore

Postage	$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	$

Postmark Here
1/19/01

Name (Please Print Clearly) (to be completed by mailer)
Tropicana Products
Street, Apt. No., or PO Box No.
P.O. Box 338
City, State, ZIP+4
Bradenton, FL 34206

PS Form 3800, July 1999 — See Reverse for Instructions

SENDER: *COMPLETE THIS SECTION*

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1 Article Addressed to:

Mr. Donald Antenore
Vice President, Mfg.
Tropicana Products, Inc.
P. O. Box 338
Bradenton, FL 34206

COMPLETE THIS SECTION ON DELIVERY

A. Received by *(Please Print Clearly)* — B. Date of Delivery
Don Baker

C. Signature
X Don Baker
☐ Agent
☐ Addressee

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

BRADENTON FL JAN 22 2001 POSTAL SERVICE

3. Service Type
☒ Certified Mail ☐ Express Mail
☐ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? *(Extra Fee)* ☐ Yes

2. Article Number *(Copy from service label)*
7099 3400 0000 1453 2719

PS Form 3811, July 1999 — Domestic Return Receipt — 102595-99-M-1789

UNITED STATES POSTAL SERVICE

First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

• Sender: Please print your name, address, and ZIP+4 in this box •

Dept. of Environmental Protection
Division of Air Resources Mgt.
Bureau of Air Regulation, NSR
2600 Blair Stone Rd , MS 5505
Tallahassee, FL 32399-2400

. 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 120.569 and 120.57 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.

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 of the Florida Statutes. The petition must contain the information as 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) of the Florida Statutes must be filed within fourteen days of publication of the public notice or with fourteen days of receipt of this notice of intent, whichever occurs first. Under section 120.60(3), however, any person who asked the Department 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 appropriate 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.

A petition that disputes the material facts on which the Department'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 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 petition must so indicate;

(e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's action; and

(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 Department'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.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that 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 such final decision of the Department 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, 8:00am to 5:00pm, Monday through Friday, except legal holidays, at:

Dept. of Environmental Protection
Bureau of Air Regulation
Suite 4,111 S. Magnolia Dr.
Tallahassee, Fl. 32301
Telephone 850-488-0114
FAX: 850-922-6979

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

The complete project file includes the application, technical evaluations, 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, New Source Review Section, or the Department's reviewing engineer for this project, Joseph Kahn, P.E., 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.

1/25/01

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

RECEIVED
JAN 31 2001
BUREAU OF AIR REGULATION

Bradenton Herald
Published Daily
Bradenton, Manatee, Florida

STATE OF FLORIDA
COUNTY OF MANATEE;

Before the undersigned authority personally appeared Sheila Dalesio, 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 in the Court, was published in said newspaper in the issues of JANUARY 25, 2001.

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.

Sheila Dalesio
(Signature of Affiant)

Sworn to and subscribed before me this
25th Day of January, 2001

DIANE S. BACRO
Notary Public - State of Florida
My Commission Expires Aug 15, 2003
Commission # CC863180

Diane S. Bacro
SEAL & Notary Public

Personally Known X OR Produced Identification_____
Type of Identification Produced_____

PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
DEP FILE No. 0810007-008-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 13rh Ave., Bradenton, Manatee County. The **applicant's mailing address: P.O. Box 338, Bradenton, Florida 34206.** The permit is to allow the occasional temporary installation of a standby process steam boiler with a physical capacity of 99mmBtu/hour or less, that fires natural gas and low sulfur distillate fuel oil (0.05% sulfur by weight). This permitting action will allow the applicant the flexibility to install the portable boiler or remove it in accordance with the applicant's needs. The applicant is not limited to the use of any particular make or model boiler, and the length of time the boiler may be located at the facility is not limited. Further, the applicant may install and remove a boiler, and then install it or another boiler again, as needed. The permit term is five years, to allow for the installation and removal of the boiler as needed over that period of time. This project is not subject to the requirements for PSD. An air quality impact analysis was not required.

Total emissions of pollutants from the fuel change authorized by this permit will not exceed the following approximate annual emission rates in tons per year. PM, 1.2; SO2, 2.7; NOx, 30.6; CO, 21.6; VOC, 1.4.

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.

7099 3400 0000 1449 3881

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

Article Sent To:
Mr. Donald Antenore, VP, Mfg.

Postage	$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	$

Tropicana Products, Inc
Postmark Here

Name (Please Print Clearly) (to be completed by mailer)
Mr. Donald Antenore
Street, Apt. No.; or PO Box No.
PO Box 338
City, State, ZIP+4
Bradenton, Fl 34206

PS Form 3800, July 1999 — See Reverse for Instructions

SENDER: *COMPLETE THIS SECTION*

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1 Article Addressed to:

Mr. Donald Antenore
Vice President, Mfg.
Tropicana Products, Inc.
PO Box 338
Bradenton, FL 34206

COMPLETE THIS SECTION ON DELIVERY

A. Received by *(Please Print Clearly)* B. Date of Delivery

C. Signature

X [signature] ☐ Agent ☐ Addressee

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

BRADENTON FL CALLER SERVICE FEB 15 2001

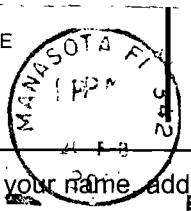
3. Service Type
☑ Certified Mail ☐ Express Mail
☐ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? *(Extra Fee)* ☐ Yes

2. Article Number *(Copy from service label)*
7099 3400 0000 1449 3881

PS Form 3811, July 1999 — Domestic Return Receipt — 102595-99-M-1789

UNITED STATES POSTAL SERVICE



First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

• Sender: Please print your name, address, and ZIP+4 in this box. •

RECEIVED

FEB 22 2001

BUREAU OF AIR REGULATION

Dept. of Environmental Protection
Division of Air Resources Mgt.
Bureau of Air Regulation, NSR
2600 Blair Stone Rd., MS 5505
Tallahassee, FL 32399-2400

32399+2400