

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
NOTICE OF FINAL PERMIT

In the Matter of an
Application for Permit by:

Mr. Michael Haycock, Vice President, Mfg.
Tropicana Products, Inc.
PO Box 338
Bradenton, Florida 34206

DEP File No. 0870007-011-AC
New Gas Turbine
Manatee County

Enclosed is Final Permit Number 0870007-010-AC. This permit authorizes Tropicana Products, Inc. to install a new General Electric Model LM 6000 gas turbine, which will utilize the existing Heat Recovery Steam Generator, at its existing facility located at 1001 13th Avenue, Bradenton, Manatee County. 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.



A. A. Linero, P.E.
Bureau of Air Regulation

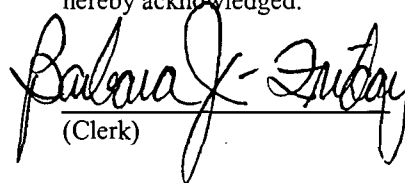
CERTIFICATE OF SERVICE

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 10/22/02 to the person(s) listed:

Mr. Michael Haycock, Tropicana Products, Inc. *
Mr. Ken Kosky, P.E., Golder
Mr. Gerald Kissel, 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.

 10/22/02
(Clerk) (Date)

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none"> 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. 		A. Received by (Please Print Clearly) LEE TANNER B. Date of Delivery 10-25-02	
1. Article Addressed to: Mr. Michael Haycock, Vice President Mfg. Tropicana Products, Inc. P.O. Box 338 Bradenton, Florida 34206		C. Signature X <i>Lee Tanner</i> <input type="checkbox"/> Agent <input type="checkbox"/> Addressee D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If YES, enter delivery address below:	
		3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.	
		4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes	
2. Article Number (Copy from service label) 7000 0600 0021 6524 2847			

PS Form 3811, July 1999

Domestic Return Receipt

102595-00-M-0952

U.S. Postal Service CERTIFIED MAIL RECEIPT (Domestic Mail Only; No Insurance Coverage Provided)	
Article Sent To: Mr. Michael Haycock, Vice President, Mfg.	
Postage \$	Postmark Here
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees \$	
Name (Please Print Clearly) (to be completed by mailer) Mr. Michael Haycock, Vice President, Mfg. Street, Apt. No., or PO Box No. P.O. Box 338 City, State, ZIP+4 Bradenton, Florida 34206	
PS Form 3800, July 1999 See Reverse for Instructions	

TECHNICAL EVALUATION AND FINAL DETERMINATION

1 APPLICANT NAME AND ADDRESS

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

Authorized Representative: Michael Haycock, 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 new General Electric Model LM 6000 gas turbine to replace an existing General Electric Model LM 5000 gas turbine (Emissions Unit I.D. No. -016). The existing Heat Recovery Steam Generator (HRSG) will be utilized with the new turbine. The applicant did not seek any relaxation in currently enforceable conditions in its existing emissions units.

Emissions unit addressed by this permit is:

E.U. ID

No.

-026

Brief Description

New Gas Turbine/Existing HRSG at Cogeneration Plant

The emissions increases associated with this project were estimated as follows in tons per year. No contemporaneous emissions were assumed in this estimate.

Pollutant	Net Increase ¹	PSD Significance	Subject to PSD?
PM/ PM ₁₀	8.4	25/15	No
SO ₂	4.8	40	No
NO _x	35.6	40	No
CO	91.0	100	No
VOC	1.7	40	No

¹ Potential emissions (shown as net increase) were estimated by the Department from the manufacturer's design fuel use at 70°F inlet temperature, the requested allowable emissions rates and the past actual emissions.

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, PM₁₀, carbon monoxide, SO₂, 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 exceed 100 tons per year (TPY). The Department has previously found that citrus juice processing facilities such as this facility have potential emissions of VOC exceeding 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, F.A.C., Prevention of Significant Deterioration (PSD). The net increase in emissions of PM/PM₁₀, CO, NO_x, SO₂, 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 New Source Review (NSR) requirements of Rule 62-212.400(5), F.A.C., for these pollutants.

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 not required for this project because it is not subject to the requirements of PSD NSR.

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 cannot be used to vary any NSPS requirements applicable to this emissions unit.

5 LIMITS AND COMPLIANCE REQUIREMENTS

The permit maintains the previously established limits on the operation of the HRSG. New limits were imposed on the operation of the gas turbine for fuel sulfur content, nitrogen oxides and carbon monoxide. Additional specific emission limits were not imposed because the potential emissions are well below the PSD significance criteria and are not specifically regulated by the NSPS. The operating limits 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 the new gas turbine, subject to the terms and conditions of the draft permit.

7 FINAL DETERMINATION

An "INTENT TO ISSUE AIR CONSTRUCTION PERMIT" to Tropicana Products, Inc. for their existing citrus juice processing plant located at 1001 13th Avenue, Bradenton, Manatee County was clerked on September 12, 2002. The "PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT" was published in the Bradenton Herald on September 27, 2002. The Draft Air Construction Permit was available for public inspection at the Southwest District office in Tampa and the permitting authority's office in Tallahassee. Proof of publication of the "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" was received on October 7, 2002.

Comments were received during the fourteen (14) day public comment period from Tropicana Products, Inc. Listed below is a response to each comment in the order that the comment was received. The comment(s) will not be restated.

1.R: The Department agrees with the comment and the following change is made.

From: The natural gas fired General Electric (GE) LM 6000 gas turbine (GT), equipped with a low NO_x burner, has a maximum design heat input capacity of 434 MMBtu per hour (HHV) at 52°F, and a natural gas fired Heat Recovery Steam Generator (HRSG) with a maximum design heat input capacity of 104 MMBtu per hour. The cogeneration project has an electric generation capacity of 49.9 MW.

To: The natural gas fired General Electric (GE) LM 6000 gas turbine (GT), equipped with NO_x control, has a maximum design heat input capacity of 456 MMBtu per hour (HHV) at 49.9 megawatts

(MW), and a natural gas fired Heat Recovery Steam Generator (HRSG) with a maximum design heat input capacity of 104 MMBtu per hour. The cogeneration project has an electric generation capacity of 49.9 MW.

2.R: The Department agrees with the comment and the following change is made.

From: 1. Capacity.

- a. The maximum heat input to the Gas Turbine shall not exceed 434 MMBtu per hour (HHV) at 52°F.
- b. The maximum heat input to the Heat Recovery Steam Generator shall not exceed 104 MMBtu per hour (99 MCF/hr of natural gas).
- c. Heat input to the Heat Recovery Steam Generator shall not exceed 91 MMBtu per hour on a 30 day rolling average basis.

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; AC41-157745; and, Applicant request dated 8/27/02]

To: 1. Capacity.

- a. The maximum heat input to the Gas Turbine shall not exceed 456 MMBtu per hour (HHV) at 49.9 MW. Electrical power from the gas turbine shall be limited to 49.9 MW on an hourly basis.
- b. The maximum heat input to the Heat Recovery Steam Generator shall not exceed 104 MMBtu per hour (99 MCF/hr of natural gas).
- c. Heat input to the Heat Recovery Steam Generator shall not exceed 91 MMBtu per hour on a 30 day rolling average basis.

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; AC41-157745; and, Applicant request dated 8/27/02]

3.R: The Department agrees with the comment and the following change is made.

From: 2. Methods of Operation - (i.e., Fuels) The Gas Turbine/Heat Recovery Steam Generator shall fire natural gas only. The sulfur content of the fuel (natural gas) used in the Gas Turbine shall not exceed one gram sulfur per 100 cubic feet. [Rules 62-4.160(2), 62-204.800(7)(b)39, and 62-213.440(1), F.A.C.; AC41-157745; and, Applicant request dated 8/27/02]

To: 2. Methods of Operation - (i.e., Fuels) The Gas Turbine/Heat Recovery Steam Generator shall fire natural gas only. The sulfur content of the fuel (natural gas) used in the Gas Turbine shall not exceed one grain sulfur per 100 cubic feet. [Rules 62-4.160(2), 62-204.800(7)(b)39, and 62-213.440(1), F.A.C.; AC41-157745; and, Applicant request dated 8/27/02]

4.R: The Department agrees with the comment and the following change is made.

From: 6. Emissions from the Heat Recovery Steam Generator shall not exceed any of the following:

Pollutant	Heat Recovery Steam Generator	
	Pounds per Hour ¹	Tons per Year ¹
NOx	10.4	39.9
CO	14.56	55.8

TECHNICAL EVALUATION AND FINAL DETERMINATION

PM/PM ₁₀	0.25	0.95
SO ₂	0.29	0.60
VOC	4.16	15.9

¹Note: Heat Recovery Steam Generator pounds per hour emissions are based on 104 MMBtu/hr maximum heat input rate, while the tons/yr emissions are based on the 91 MMBtu/hr maximum 30 day rolling average heat input rate. [Air Construction Permit AC41-157745 as amended May 20, 1992]

To: 6. Emissions from the Heat Recovery Steam Generator shall not exceed any of the following:

Pollutant	Heat Recovery Steam Generator	
	Pounds per Hour ¹	Tons per Year ¹
NO _x	10.4	39.9
CO	14.56	55.8
PM/PM ₁₀	1.04	4.0
SO ₂	0.29	0.60
VOC	4.16	15.9

¹Note: Heat Recovery Steam Generator pounds per hour emissions are based on 104 MMBtu/hr maximum heat input rate, while the tons/yr emissions are based on the 91 MMBtu/hr maximum 30 day rolling average heat input rate. [Air Construction Permit 0810007-009-AC]

5.R: The Department agrees with the comment and the following change is made.

From: 8. Compliance with the emission limitations of Conditions 3 through 6, of this section, shall be determined using the following EPA Methods contained in 40 CFR 60, Appendix A and adopted by reference in Chapter 62-297, F.A.C.

- EPA Method 5, 5B, or 17 for PM
- EPA Method 201 or 201A for PM₁₀ (recommended)
- EPA Method 7/ 20 or 7E for NO_x
- EPA Method 9 for VE
- EPA Method 10 for CO
- EPA Method 25A for VOC

The minimum requirements for stationary point source emission test procedures and reporting shall be in accordance with 40 CFR 60 Appendix A and Chapter 62-297, F.A.C. [Chapter 62-297, F.A.C.; Air Construction Permit AC41-157745]

To: 8. Compliance with the emission limitations of Conditions 3 through 6, of this section, shall be determined using the following EPA Methods contained in 40 CFR 60, Appendix A and adopted by reference in Chapter 62-297, F.A.C.

- EPA Method 5, 5B, or 17 for PM
- EPA Method 201 or 201A for PM₁₀ (recommended)
- EPA Method 7/ 20 or 7E for NO_x

- d. EPA Method 9 for VE
- e. EPA Method 10 for CO
- f. EPA Method 18 or 25A for VOC

The minimum requirements for stationary point source emission test procedures and reporting shall be in accordance with 40 CFR 60 Appendix A and Chapter 62-297, F.A.C. [Chapter 62-297, F.A.C.; Air Construction Permit AC41-157745]

6.R: The Department agrees with the comment and the following change is made.

From: 10. Testing of emissions must be conducted during operation of the Gas Turbine at a heat input rate within 95-100% of the maximum capacity achievable for the average ambient temperature during the compliance tests (or at a heat input rate between 90-100% of the maximum permitted heat input rate of 434 MMBtu per hour (HHV) at 52°F.) and operation of the Heat Recovery Steam Generator at a heat input rate within 90 to 100% of the maximum permitted rate of 104 MMBTU per hour. The turbine manufacturer's capacity vs. ambient temperature curve shall be included with the test report. A compliance test submitted at operating rates less than those specified above will automatically constitute an amended permit at the lesser rates until another test showing compliance at higher rates is submitted. Failure to submit the operating (heat input) rates or operation at conditions that do not represent normal operating conditions may invalidate the test. [Rule 62-4.070(3), F.A.C.]

To: 10. Testing of emissions must be conducted during operation of the Gas Turbine at a heat input rate within 95-100% of the maximum capacity achievable for the average ambient temperature during the compliance tests (or at a heat input rate between 90-100% of the maximum permitted heat input rate of 456 MMBtu per hour (HHV) at 49.9 MW) and operation of the Heat Recovery Steam Generator at a heat input rate within 90 to 100% of the maximum permitted rate of 104 MMBTU per hour. The turbine manufacturer's capacity vs. ambient temperature curve shall be included with the test report. A compliance test submitted at operating rates less than those specified above will automatically constitute an amended permit at the lesser rates until another test showing compliance at higher rates is submitted. Failure to submit the operating (heat input) rates or operation at conditions that do not represent normal operating conditions may invalidate the test. [Rule 62-4.070(3), F.A.C.]

As a result, the permit will be issued, as noticed, with the changes discussed, above.

DETAILS OF THIS ANALYSIS MAY BE OBTAINED BY CONTACTING:

Edward J. Svec, Engineer IV
Department of Environmental Protection
Bureau of Air Regulation
Mail Station #5505
2600 Blair Stone Road
Tallahassee, Florida 32399-2400
Telephone: 850/488-0114



Jeb Bush
Governor

Department of Environmental Protection

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.	0810007-011-AC
Project	New Gas Turbine
SIC No.	2033, 2037, 2048
Expires:	December 31, 2004

Authorized Representative:

Michael Haycock, Vice President, Mfg.

PROJECT AND LOCATION

This permit authorizes Tropicana Products, Inc. to install a new General Electric Model LM 6000 gas turbine.

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 unit 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 Resource
Management

AIR CONSTRUCTION PERMIT
SECTION I. FACILITY INFORMATION

FACILITY AND PROJECT DESCRIPTION

The facility is an existing citrus juice processing facility. The project is the installation of a new General Electric Model LM 6000 gas turbine to replace an existing General Electric Model LM 5000 gas turbine (Emissions Unit I.D. No. -016). The existing Heat Recovery Steam Generator (HRSG) will be utilized with the new turbine, without modification. The applicant did not seek any relaxation in currently enforceable conditions for its existing emissions units.

The annual potential emissions associated with this project in tons per year are approximately: PM/PM₁₀, 8.4; CO, 91.0; NO_x, 35.6; SO₂, 4.8; and VOC, 1.7. 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

August 29, 2002	Received permit application (no application fee required)
August 29, 2002	Application complete
September 12, 2002	Distributed Notice of Intent to Issue and supporting documents
September 27, 2002	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

AIR CONSTRUCTION PERMIT
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 December 31, 2004. 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

AIR CONSTRUCTION PERMIT
SECTION II. FACILITY-WIDE SPECIFIC CONDITIONS

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 these emissions units (emissions unit 026, 003) as specified below. These provisions cannot 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 026 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.]

AIR CONSTRUCTION PERMIT
SECTION II. FACILITY-WIDE SPECIFIC CONDITIONS

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.]

AIR CONSTRUCTION PERMIT
SECTION III. EMISSIONS UNITS SPECIFIC CONDITIONS

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

E.U. ID

No.

Brief Description

-026

New Gas Turbine/Existing HRSG at Cogeneration Plant

The natural gas fired General Electric (GE) LM 6000 gas turbine (GT), equipped with NO_x control, has a maximum design heat input capacity of 456 MMBtu per hour (HHV) at 49.9 megawatts (MW), and a natural gas fired Heat Recovery Steam Generator (HRSG) with a maximum design heat input capacity of 104 MMBtu per hour. The cogeneration project has an electric generation capacity of 49.9 MW.

{Permitting note(s): This emission unit is regulated under NSPS - 40 CFR 60 Subpart GG - Standards of Performance for Stationary Gas Turbines, adopted and incorporated by reference in Rule 62-204.800, F.A.C. Based on the heat input capacity of the turbine and the fact that it is not an electric utility stationary gas turbine, the nitrogen oxides standards of 40 CFR 60 Subpart GG do not apply to this source. The HRSG is subject to NSPS - 40 CFR 60 Subpart Db - Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units, adopted and incorporated by reference in Rule 62-204.800, F.A.C. and Rule 62-296.406, F.A.C., Fossil Fuel Steam Generators with less than 250 Million Btu per Hour Heat Input, New and Existing Sources.}

The following specific conditions apply to the emissions unit(s) listed above:

Essential Potential to Emit (PTE) Parameters

1. Capacity.

a. The maximum heat input to the Gas Turbine shall not exceed 456 MMBtu per hour (HHV) at 49.9 MW. Electrical power from the gas turbine shall be limited to 49.9 MW on an hourly basis.

b. The maximum heat input to the Heat Recovery Steam Generator shall not exceed 104 MMBtu per hour (99 MCF/hr of natural gas).

c. Heat input to the Heat Recovery Steam Generator shall not exceed 91 MMBtu per hour on a 30 day rolling average basis.

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; AC41-157745; and, Applicant request dated 8/27/02]

2. Methods of Operation - (i.e., Fuels) The Gas Turbine/Heat Recovery Steam Generator shall fire natural gas only. The sulfur content of the fuel (natural gas) used in the Gas Turbine shall not exceed one grain sulfur per 100 cubic feet. [Rules 62-4.160(2), 62-204.800(7)(b)39, and 62-213.440(1), F.A.C.; AC41-157745; and, Applicant request dated 8/27/02]

Emission Limitations and Standards

3. Visible emissions from the Gas Turbine and Heat Recovery Steam Generator shall not exceed 10% opacity. Testing for this limit shall be conducted upon initial operation and annually thereafter. [AC41-157745 and Applicant request dated 8/27/02]

AIR CONSTRUCTION PERMIT

SECTION III. EMISSIONS UNITS SPECIFIC CONDITIONS

4. Carbon monoxide (CO) emissions shall not exceed the following:
- a. 30 ppmvd (corrected to 15% O₂), for the Gas Turbine. Testing for this pollutant shall be conducted upon initial operation, only.
 - b. 0.14 pounds/MMBtu for the Heat Recovery Steam Generator.
[BACT Determination of May 29, 1989 and Applicant request dated 8/27/02]
5. Nitrogen oxides (NO_x) emissions shall not exceed the following:
- a. 25 ppmvd (corrected to 15% O₂), for the Gas Turbine. Testing for this pollutant shall be conducted upon initial operation and annually thereafter.
 - b. 0.1 pounds/MMBtu for the Heat Recovery Steam Generator.¹
[BACT Determination of May 29, 1989, in accordance with Rule 62-212.400, F.A.C. and Applicant request dated 8/27/02]
- {¹Permitting Note: Compliance with this BACT limit will also satisfy the less stringent requirements of Subpart Db - 40 CFR 60.44b(a)(4)(i), which specifies a NO_x limit of 0.2 lb/MMBtu for duct burners used in a combined cycle system.}
6. Emissions from the Heat Recovery Steam Generator shall not exceed any of the following:

Pollutant	Heat Recovery Steam Generator	
	Pounds per Hour ¹	Tons per Year ¹
NO _x	10.4	39.9
CO	14.56	55.8
PM/PM ₁₀	1.04	4.0
SO ₂	0.29	0.60
VOC	4.16	15.9

¹Note: Heat Recovery Steam Generator pounds per hour emissions are based on 104 MMBtu/hr maximum heat input rate, while the tons/yr emissions are based on the 91 MMBtu/hr maximum 30 day rolling average heat input rate. [Air Construction Permit 0810007-009-AC]

AIR CONSTRUCTION PERMIT

SECTION III. EMISSIONS UNITS SPECIFIC CONDITIONS

Test Methods and Procedures

7. Test the Heat Recovery Steam Generator for emissions of the following pollutants annually on or during the 60-day period prior to March 1.

- a. Visible emissions (VE)
- b. Nitrogen Oxides (NO_x)
- c. Sulfur Dioxide (SO₂)

[Air Construction Permit AC41-157745/PSD-FL-136]

{Permitting Notes: (1) A fuel analysis, including sulfur content, of a representative fuel sample and a calculation of the sulfur dioxide emission rate based on the fuel analysis may be submitted in lieu of the required sulfur oxides emission test. (2) Although CO, PM, and VOC are limited in Condition 6, above, the referenced construction permit specified that testing for these pollutants shall be conducted upon initial operation only. (3) The compliance test due date is for planning purposes only. Rule 62-297.310(7)(a)4, F.A.C., allows the permittee to conduct a formal compliance test any time during the federal fiscal year (October 1 – September 30).}

8. Compliance with the emission limitations of Conditions 3 through 6, of this section, shall be determined using the following EPA Methods contained in 40 CFR 60, Appendix A and adopted by reference in Chapter 62-297, F.A.C.

- a. EPA Method 5, 5B, or 17 for PM
- b. EPA Method 201 or 201A for PM₁₀ (recommended)
- c. EPA Method 7/ 20 or 7E for NO_x
- d. EPA Method 9 for VE
- e. EPA Method 10 for CO
- f. EPA Method 18 or 25A for VOC

The minimum requirements for stationary point source emission test procedures and reporting shall be in accordance with 40 CFR 60 Appendix A and Chapter 62-297, F.A.C. [Chapter 62-297, F.A.C.; Air Construction Permit AC41-157745]

9. The visible emissions tests shall be conducted by a certified observer and be a minimum of sixty (60) minutes in duration. The test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur. [Rule 62-297.310(4)(a), F.A.C.]
10. Testing of emissions must be conducted during operation of the Gas Turbine at a heat input rate within 95-100% of the maximum capacity achievable for the average ambient temperature during the compliance tests (or at a heat input rate between 90-100% of the maximum permitted heat input rate of 456 MMBtu per hour (HHV) at 49.9 MW) and operation of the Heat Recovery Steam Generator at a heat input rate within 90 to 100% of the maximum permitted rate of 104 MMBTU per hour. The turbine manufacturer's capacity vs. ambient temperature curve shall be included with the test report. A compliance test submitted at operating rates less than those specified above will automatically constitute an amended permit at the lesser rates until another test showing compliance at higher rates is submitted. Failure to submit the operating (heat input) rates or operation at conditions that do not represent normal operating conditions may invalidate the test. [Rule 62-4.070(3), F.A.C.]

AIR CONSTRUCTION PERMIT

SECTION III. EMISSIONS UNITS SPECIFIC CONDITIONS

Operating Conditions

11. The sale of electrical output generated by the Gas Turbine/Heat Recovery Steam Generator unit shall not exceed one third (33.3%) of the total annual electrical output based on a 12 month rolling average. (This limitation is necessary to insure that this source (emission unit) is not considered an electric utility gas turbine under Subpart GG - 40 CFR 60.331(q).) [Rule 62-204.800(7)(b)39, F.A.C.; 40 CFR 60.331(q)]

Monitoring, Recordkeeping and Reporting Requirements

12. In order to document compliance with the limitations of Conditions 2 and 6, of this section, the permittee shall maintain records of the sulfur content in the natural gas as supplied by the pipeline company. The Department may require the permittee to independently verify the sulfur content of the natural gas whenever the Department does not have reasonable assurance that the sulfur content information provided by the natural gas supplier accurately represents the sulfur content in the natural gas combusted in this source (emission unit). Compliance with the sulfur content standards shall be in accordance with the requirements of Subpart GG - 40 CFR 60.335(d). Proof of compliance with the annual SO₂ limitation (including calculations) shall be submitted along with the annual operating report each year. [Air Construction Permit AC41-159485 as amended May 20, 1992; Rule 62-204.800(7)(b)39, F.A.C.; 40 CFR 60.335(d)]
13. The permittee shall keep records of total electrical generation output and electrical output sold such that compliance with Condition 11, above, can be determined. [Rule 62-213.440, F.A.C.]
14. The permittee shall submit quarterly SO₂ excess emission reports in accordance with 40 CFR 60.7(c) and Subpart GG - 40 CFR 60.334(c)(2). If there are no excess emissions during a calendar quarter the permittee shall submit a report stating that no excess emissions occurred during the reporting period. [Rule 62-204.800(7)(b)39, F.A.C.; 40 CFR 60.334(c)(2)]
15. All reports required by 40 CFR 60 shall be submitted to the Air Compliance Sections of the MCEMD and Southwest District Office of the Department. All quarterly reports shall be postmarked by the 30th day following the end of each calendar quarter. [Rule 62-213.440, F.A.C.]

APPENDIX GC
GENERAL PERMIT CONDITIONS [RULE 62-4.160, F.A.C.]

- 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.

APPENDIX GC
GENERAL PERMIT CONDITIONS [RULE 62-4.160, F.A.C.]

- 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 extent 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 ();
 - (b) Determination of Prevention of Significant Deterioration (); and
 - (c) Compliance with New Source Performance Standards (X).
- 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.

Memorandum

Florida Department of Environmental Protection

TO: Howard L. Rhodes
THRU: Scott Sheplak *SMS* *10/16*
FROM: Edward Svec *ES*
DATE: October 14, 2002
SUBJECT: Tropicana Products, Inc.
New Gas Turbine
DEP File No: 0810007-011-AC

Attached for approval and signature is a final air construction permit for Tropicana Products, Inc., Bradenton Plant. The permit allows the installation of a new gas turbine as a replacement for their existing turbine. The applicant did not seek any relaxation in currently enforceable conditions in its other existing emissions units.

Comments were received during the public comment period from Tropicana correcting some transcription errors and were addressed to their satisfaction.

I recommend your approval and signature.

December 11, 2002 is day 90.

SMS/es
Attachments

*Post Actual to Future Potential does not
trigger PSD. AQ*

Golder Associates Inc.

6241 NW 23rd Street, Suite 500
Gainesville, FL 32653-1500
Telephone (352) 336-5600
Fax (352) 336-6603



RECEIVED 0237563

OCT 14 2002

BUREAU OF AIR REGULATION

October 11, 2002

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

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

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

Dear Ed:

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

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

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

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

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

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

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

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

Sincerely,

GOLDER ASSOCIATES INC.

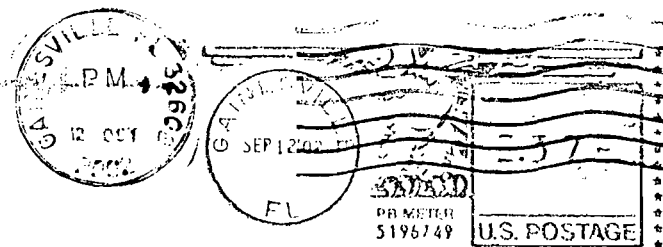


Kennard F. Kosky, P.E.
Principal

KFK/jkw

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

P:\Projects\2002\0237563 Tropicana\4\4.1\101102.doc



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

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

32399+2400 



RECEIVED

OCT 07 2002

CERTIFIED MAIL-RETURN RECEIPT
October 3, 2002

BUREAU OF AIR REGULATION

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

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

Dear Mr. Svec:

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

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

Sincerely,

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

Douglas E. Foster
Director, Corporate Environmental & Safety

jlb

Enclosure

BRADENTON HERALD

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

Bradenton Herald
Published Daily
Bradenton, Manatee, Florida

RECEIVED

OCT 07 2002

BUREAU OF AIR REGULATION

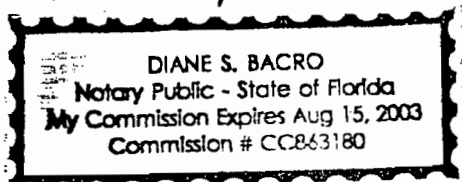
STATE OF FLORIDA
COUNTY OF MANATEE;

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

Affiant further says that the said publication is a newspaper published at Bradenton, in said Manatee County, Florida, and that the said newspaper has heretofore been continuously published in said Manatee County, Florida, each day and has been entered as second-class mail matter at the post office in Bradenton, in said Manatee County, Florida for a period of 1 year next preceding the first publication of the attached copy of advertisement; and affiant further says that she has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.

Sandy Riley
(Signature of Affiant)

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



Diane S. Bacro
SEAL & Notary Public

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

PUBLIC NOTICE OF
INTENT TO ISSUE AIR
CONSTRUCTION PER-
MIT
STATE OF FLORIDA
DEPARTMENT OF
ENVIRONMENTAL
PROTECTION

DEP File No. 0810007-
011-AC

Tropicana Products,
Inc.

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

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

The Department will
issue the final permit
with the attached con-
ditions 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 com-
ments 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 construc-
tion 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 com-
ments filed shall be
made available for
public inspection. If
written comments
received result in a sig-
nificant change in the
proposed agency
action, the Department
shall revise the pro-
posed permit and

require, if applicable,
another Public Notice.

The Department will
issue the permit with
the attached condi-
tions unless a timely
petition for an adminis-
trative hearing is filed
pursuant to Sections
1201569 and 120.57,
Florida Statutes (F.S.),
before the deadline for
filing a petition. The
procedures for peti-
tioning for a hearing
are set forth below.
Mediation is not avail-
able 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 (F.S.). The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the permitting authority for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. The failure of any person to file a petition within the applicable time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57 F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, of the Florida Administrative Code (F.A.C.).

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

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

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

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

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

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

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

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

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



Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

September 23, 2002

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Michael Haycock
Vice President, Mfg.
Tropicana Products, Inc.
PO Box 338
Bradenton, Florida 34206

Re: DEP File No. 0810007-011-AC
New Gas Turbine

Dear Mr. Haycock:

Enclosed is one copy of the draft air construction permit to Tropicana Products, Inc. to allow the installation of a new General Electric Model LM 6000 gas turbine, which will utilize the existing Heat Recovery Steam Generator, at the cogeneration plant of the citrus juice processing plant located at 1001 13th Avenue, Bradenton, Manatee County. The Technical Evaluation and Preliminary 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 pursuant to Rule 62-110.106(5), F.A.C. Failure to publish the notice and provide proof of publication may result in the denial of the permit pursuant to Rule 62-110.106(11), F.A.C.

Please submit any written comments you wish to have considered concerning the Department's proposed action to Scott M. Sheplak, P.E., Administrator, Title V Section at the above letterhead address. If you have any other questions, please contact Edward J. Svec at 850/921-8985.

Sincerely,

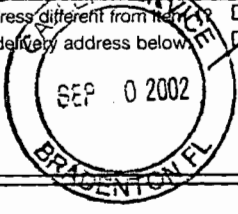
A. A. Linero, P.E.
Bureau of Air Regulation

SMS/es

Enclosures

"More Protection, Less Process"

Printed on recycled paper.

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none"> 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. 		A. Received by (Please Print Clearly) <i>E. F. Albrecht</i> B. Date of Delivery C. Signature <i>E. F. Albrecht</i> <input type="checkbox"/> Agent <input type="checkbox"/> Addressee D. Is delivery address different from item C? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If YES, enter delivery address below:	
1. Article Addressed to: Mr. Michael Haycock Vice President, Manufacturing Tropicana Products, Inc. P. O. Box 338 Bradenton, FL 34206		3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D. 4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes	
2. 7001 0320 0001 3692 7935			

PS Form 3811, July 1999 Domestic Return Receipt 102595-00-M-0952

U.S. Postal Service CERTIFIED MAIL RECEIPT (Domestic Mail Only; No Insurance Coverage Provided)	
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PS Form 3800, January 2001 See Reverse for Instructions	

In the Matter of an
Application for Permit by:

Michael Haycock, Vice President, Mfg.
Tropicana Products, Inc.
PO Box 338
Bradenton, Florida 34206

DEP File No. 0810007-011-AC
New Gas Turbine
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 August 29, 2002, to the Department for an air construction permit for its existing citrus juice processing facility located at 1001 13th Avenue, Bradenton, Manatee County. The project is the installation of a new General Electric Model LM 6000 gas turbine to replace an existing General Electric Model LM 5000 gas turbine (Emissions Unit I.D. No. -016). The existing Heat Recovery Steam Generator (HRS) will be utilized with the new turbine.

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 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.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under Sections 120.569 and 120.57, F.S. The petition must contain the

information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida, 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S. must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the 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.



A. A. Linero, P.E.
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 9/26/02 to the person(s) listed:

Mr. Michael Haycock, Tropicana Products, Inc. *
Mr. Ken Kosky, P.E., Golder
Mr. Gerald Kissel, P.E., DEP SWD
Ms. Karen Collins-Fleming, 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.

 9/26/02
(Clerk) (Date)

PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

DEP File No. 0810007-011-AC

Tropicana Products, Inc.
Manatee County

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

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

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, Florida Statutes (F.S.), before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below.

Mediation is not available in this proceeding.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida, 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S. must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the 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 (F.A.C.).

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;

NOTICE TO BE PUBLISHED IN THE NEWSPAPER

(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, F.A.C.

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 evaluation, draft permit, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Administrator, Title V Section, or the Department's reviewing engineer for this project, Edward J. Svec, at the Bureau of Air Regulation in Tallahassee, Florida, or call 850/488-0114, for additional information. Written comments directed to the Department's reviewing engineer should be sent to the following mailing address: Dept. of Environmental Protection, Bureau of Air Regulation, Mail Station #5505, Tallahassee, Florida, 32399-2400.

NOTICE TO BE PUBLISHED IN THE NEWSPAPER



Jeb Bush
Governor

Department of Environmental Protection

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.	0810007-011-AC
Project	New Gas Turbine
SIC No.	2033, 2037, 2048
Expires:	^DRAFT

Authorized Representative:

Michael Haycock, Vice President, Mfg.

PROJECT AND LOCATION

This permit authorizes Tropicana Products, Inc. to install a new General Electric Model LM 6000 gas turbine.

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 unit 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

DRAFT

Howard L. Rhodes, Director
Division of Air Resource
Management

AIR CONSTRUCTION PERMIT
SECTION I. FACILITY INFORMATION

FACILITY AND PROJECT DESCRIPTION

The facility is an existing citrus juice processing facility. The project is the installation of a new General Electric Model LM 6000 gas turbine to replace an existing General Electric Model LM 5000 gas turbine (Emissions Unit I.D. No. -016). The existing Heat Recovery Steam Generator (HRSG) will be utilized with the new turbine, without modification. The applicant did not seek any relaxation in currently enforceable conditions for its existing emissions units.

The annual potential emissions associated with this project in tons per year are approximately: PM/PM₁₀, 8.4; CO, 91.0; NO_x, 35.6; SO₂, 4.8; and VOC, 1.7. 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

August 29, 2002	Received permit application (no application fee required)
August 29, 2002	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

AIR CONSTRUCTION PERMIT
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 ^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

AIR CONSTRUCTION PERMIT

SECTION II. FACILITY-WIDE SPECIFIC CONDITIONS

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 these emissions units (emissions unit 026, 003) as specified below. These provisions cannot 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 026 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.]

AIR CONSTRUCTION PERMIT
SECTION II. FACILITY-WIDE SPECIFIC CONDITIONS

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.]

AIR CONSTRUCTION PERMIT
SECTION III. EMISSIONS UNITS SPECIFIC CONDITIONS

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

E.U. ID

No. **Brief Description**

-026 New Gas Turbine/Existing HRSG at Cogeneration Plant

The natural gas fired General Electric (GE) LM 6000 gas turbine (GT), equipped with a low NO_x burner, has a maximum design heat input capacity of 434 MMBtu per hour (HHV) at 52°F, and a natural gas fired Heat Recovery Steam Generator (HRSG) with a maximum design heat input capacity of 104 MMBtu per hour. The cogeneration project has an electric generation capacity of 49.9 MW.

{Permitting note(s): This emission unit is regulated under NSPS - 40 CFR 60 Subpart GG - Standards of Performance for Stationary Gas Turbines, adopted and incorporated by reference in Rule 62-204.800, F.A.C. Based on the heat input capacity of the turbine and the fact that it is not an electric utility stationary gas turbine, the nitrogen oxides standards of 40 CFR 60 Subpart GG do not apply to this source. The HRSG is subject to NSPS - 40 CFR 60 Subpart Db - Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units, adopted and incorporated by reference in Rule 62-204.800, F.A.C. and Rule 62-296.406, F.A.C., Fossil Fuel Steam Generators with less than 250 Million Btu per Hour Heat Input, New and Existing Sources.}

The following specific conditions apply to the emissions unit(s) listed above:

Essential Potential to Emit (PTE) Parameters

1. Capacity.

- a. The maximum heat input to the Gas Turbine shall not exceed 434 MMBtu per hour (HHV) at 52°F.
- b. The maximum heat input to the Heat Recovery Steam Generator shall not exceed 104 MMBtu per hour (99 MCF/hr of natural gas).
- c. Heat input to the Heat Recovery Steam Generator shall not exceed 91 MMBtu per hour on a 30 day rolling average basis.

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; AC41-157745; and, Applicant request dated 8/27/02]

2. Methods of Operation - (i.e., Fuels) The Gas Turbine/Heat Recovery Steam Generator shall fire natural gas only. The sulfur content of the fuel (natural gas) used in the Gas Turbine shall not exceed one gram sulfur per 100 cubic feet. [Rules 62-4.160(2), 62-204.800(7)(b)39, and 62-213.440(1), F.A.C.; AC41-157745; and, Applicant request dated 8/27/02]

Emission Limitations and Standards

3. Visible emissions from the Gas Turbine and Heat Recovery Steam Generator shall not exceed 10% opacity. Testing for this limit shall be conducted upon initial operation and annually thereafter. [AC41-157745 and Applicant request dated 8/27/02]

AIR CONSTRUCTION PERMIT
SECTION III. EMISSIONS UNITS SPECIFIC CONDITIONS

4. Carbon monoxide (CO) emissions shall not exceed the following:
- a. 30 ppmvd (corrected to 15% O₂), for the Gas Turbine. Testing for this pollutant shall be conducted upon initial operation, only.
 - b. 0.14 pounds/MMBtu for the Heat Recovery Steam Generator.
[BACT Determination of May 29, 1989 and Applicant request dated 8/27/02]
5. Nitrogen oxides (NO_x) emissions shall not exceed the following:
- a. 25 ppmvd (corrected to 15% O₂), for the Gas Turbine. Testing for this pollutant shall be conducted upon initial operation and annually thereafter.
 - b. 0.1 pounds/MMBtu for the Heat Recovery Steam Generator.¹
[BACT Determination of May 29, 1989, in accordance with Rule 62-212.400, F.A.C. and Applicant request dated 8/27/02]
- {¹Permitting Note: Compliance with this BACT limit will also satisfy the less stringent requirements of Subpart Db - 40 CFR 60.44b(a)(4)(i), which specifies a NO_x limit of 0.2 lb/MMBtu for duct burners used in a combined cycle system.}
6. Emissions from the Heat Recovery Steam Generator shall not exceed any of the following:

Pollutant	Heat Recovery Steam Generator	
	Pounds per Hour ¹	Tons per Year ¹
NO _x	10.4	39.9
CO	14.56	55.8
PM/PM ₁₀	0.25	0.95
SO ₂	0.29	0.60
VOC	4.16	15.9

¹Note: Heat Recovery Steam Generator pounds per hour emissions are based on 104 MMBtu/hr maximum heat input rate, while the tons/yr emissions are based on the 91 MMBtu/hr maximum 30 day rolling average heat input rate. [Air Construction Permit AC41-157745 as amended May 20, 1992]

AIR CONSTRUCTION PERMIT
SECTION III. EMISSIONS UNITS SPECIFIC CONDITIONS

Test Methods and Procedures

7. Test the Heat Recovery Steam Generator for emissions of the following pollutants annually on or during the 60-day period prior to March 1.
- a. Visible emissions (VE)
 - b. Nitrogen Oxides (NO_x)
 - c. Sulfur Dioxide (SO₂)

[Air Construction Permit AC41-157745/PSD-FL-136]

{Permitting Notes: (1) A fuel analysis, including sulfur content, of a representative fuel sample and a calculation of the sulfur dioxide emission rate based on the fuel analysis may be submitted in lieu of the required sulfur oxides emission test. (2) Although CO, PM, and VOC are limited in Condition 6, above, the referenced construction permit specified that testing for these pollutants shall be conducted upon initial operation only. (3) The compliance test due date is for planning purposes only. Rule 62-297.310(7)(a)4, F.A.C., allows the permittee to conduct a formal compliance test any time during the federal fiscal year (October 1 – September 30).}

8. Compliance with the emission limitations of Conditions 3 through 6, of this section, shall be determined using the following EPA Methods contained in 40 CFR 60, Appendix A and adopted by reference in Chapter 62-297, F.A.C.
- a. EPA Method 5, 5B, or 17 for PM
 - b. EPA Method 201 or 201A for PM₁₀ (recommended)
 - c. EPA Method 7/ 20 or 7E for NO_x
 - d. EPA Method 9 for VE
 - e. EPA Method 10 for CO
 - f. EPA Method 25A for VOC

The minimum requirements for stationary point source emission test procedures and reporting shall be in accordance with 40 CFR 60 Appendix A and Chapter 62-297, F.A.C. [Chapter 62-297, F.A.C.; Air Construction Permit AC41-157745]

9. The visible emissions tests shall be conducted by a certified observer and be a minimum of sixty (60) minutes in duration. The test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur. [Rule 62-297.310(4)(a), F.A.C.]
10. Testing of emissions must be conducted during operation of the Gas Turbine at a heat input rate within 95-100% of the maximum capacity achievable for the average ambient temperature during the compliance tests (or at a heat input rate between 90-100% of the maximum permitted heat input rate of 434 MMBtu per hour (HHV) at 52°F.) and operation of the Heat Recovery Steam Generator at a heat input rate within 90 to 100% of the maximum permitted rate of 104 MMBTU per hour. The turbine manufacturer's capacity vs. ambient temperature curve shall be included with the test report. A compliance test submitted at operating rates less than those specified above will automatically constitute an amended permit at the lesser rates until another test showing compliance at higher rates is submitted. Failure to submit the operating (heat input) rates or operation at conditions that do not represent normal operating conditions may invalidate the test. [Rule 62-4.070(3), F.A.C.]

AIR CONSTRUCTION PERMIT

SECTION III. EMISSIONS UNITS SPECIFIC CONDITIONS

Operating Conditions

11. The sale of electrical output generated by the Gas Turbine/Heat Recovery Steam Generator unit shall not exceed one third (33.3%) of the total annual electrical output based on a 12 month rolling average. (This limitation is necessary to insure that this source (emission unit) is not considered an electric utility gas turbine under Subpart GG - 40 CFR 60.331(q).) [Rule 62-204.800(7)(b)39, F.A.C.; 40 CFR 60.331(q)]

Monitoring, Recordkeeping and Reporting Requirements

12. In order to document compliance with the limitations of Conditions 2 and 6, of this section, the permittee shall maintain records of the sulfur content in the natural gas as supplied by the pipeline company. The Department may require the permittee to independently verify the sulfur content of the natural gas whenever the Department does not have reasonable assurance that the sulfur content information provided by the natural gas supplier accurately represents the sulfur content in the natural gas combusted in this source (emission unit). Compliance with the sulfur content standards shall be in accordance with the requirements of Subpart GG - 40 CFR 60.335(d). Proof of compliance with the annual SO₂ limitation (including calculations) shall be submitted along with the annual operating report each year. [Air Construction Permit AC41-159485 as amended May 20, 1992; Rule 62-204.800(7)(b)39, F.A.C.; 40 CFR 60.335(d)]
13. The permittee shall keep records of total electrical generation output and electrical output sold such that compliance with Condition 11, above, can be determined. [Rule 62-213.440, F.A.C.]
14. The permittee shall submit quarterly SO₂ excess emission reports in accordance with 40 CFR 60.7(c) and Subpart GG - 40 CFR 60.334(c)(2). If there are no excess emissions during a calendar quarter the permittee shall submit a report stating that no excess emissions occurred during the reporting period. [Rule 62-204.800(7)(b)39, F.A.C.; 40 CFR 60.334(c)(2)]
15. All reports required by 40 CFR 60 shall be submitted to the Air Compliance Sections of the MCEMD and Southwest District Office of the Department. All quarterly reports shall be postmarked by the 30th day following the end of each calendar quarter. [Rule 62-213.440, F.A.C.]

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

1 APPLICANT NAME AND ADDRESS

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

Authorized Representative: Michael Haycock, 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 new General Electric Model LM 6000 gas turbine to replace an existing General Electric Model LM 5000 gas turbine (Emissions Unit I.D. No. -016). The existing Heat Recovery Steam Generator (HRSG) will be utilized with the new turbine. The applicant did not seek any relaxation in currently enforceable conditions in its existing emissions units.

Emissions unit addressed by this permit is:

E.U. ID

No.
-026

Brief Description

New Gas Turbine/Existing HRSG at Cogeneration Plant

The emissions increases associated with this project were estimated as follows in tons per year. No contemporaneous emissions were assumed in this estimate.

Pollutant	Net Increase ¹	PSD Significance	Subject to PSD?
PM/ PM ₁₀	8.4	25/15	No
SO ₂	4.8	40	No
NO _x	35.6	40	No
CO	91.0	100	No
VOC	1.7	40	No

¹ Potential emissions (shown as net increase) were estimated by the Department from the manufacturer's design fuel use at 70°F inlet temperature, the requested allowable emissions rates and the past actual emissions.

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, PM₁₀, carbon monoxide, SO₂, 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 exceed 100 tons per year (TPY). The Department has previously found that citrus juice processing facilities such as this facility have potential emissions of VOC exceeding 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, F.A.C., Prevention of Significant Deterioration (PSD). The net increase in emissions of PM/PM₁₀, CO, NO_x, SO₂, 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 New Source Review (NSR) requirements of Rule 62-212.400(5), F.A.C., for these pollutants.

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 not required for this project because it is not subject to the requirements of PSD NSR.

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 cannot be used to vary any NSPS requirements applicable to this emissions unit.

5 LIMITS AND COMPLIANCE REQUIREMENTS

The permit maintains the previously established limits on the operation of the HRSG. New limits were imposed on the operation of the gas turbine for fuel sulfur content, nitrogen oxides and carbon monoxide. Additional specific emission limits were not imposed because the potential emissions are well below the PSD significance criteria and are not specifically regulated by the NSPS. The operating limits 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 the new gas turbine, 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:

Edward J. Svec, Engineer IV
Department of Environmental Protection
Bureau of Air Regulation
Mail Station #5505
2600 Blair Stone Road
Tallahassee, Florida 32399-2400
Telephone: 850/488-0114

APPENDIX GC
GENERAL PERMIT CONDITIONS [RULE 62-4.160, F.A.C.]

- 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.

APPENDIX GC
GENERAL PERMIT CONDITIONS [RULE 62-4.160, F.A.C.]

- 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 extent 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 ();
 - (b) Determination of Prevention of Significant Deterioration (); and
 - (c) Compliance with New Source Performance Standards (X).
- 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.

Memorandum

Florida Department of Environmental Protection

TO: Al Linero *AL*
THRU: Scott Sheplak *SS*
FROM: Ed Svec *ES*
DATE: September 16, 2002
SUBJECT: Tropicana Products, Inc.
New Gas Turbine

Attached for approval and signature is an intent to issue a construction permit to allow Tropicana Products, Inc. to install a new gas turbine as a replacement for an existing turbine at their cogeneration plant. The proposed turbine is a GE Model LM 6000 and will utilize the existing HRSG on the present GE Model LM 5000.

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, 8.4; SO₂, 4.8; NO_x, 35.6; CO, 91.0; and, VOC, 1.7.

I recommend your approval and signature.

September 16, 2002 is day 18 of the 90 day timeclock.

Attachments

/es



Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

P.E. Certification Statement

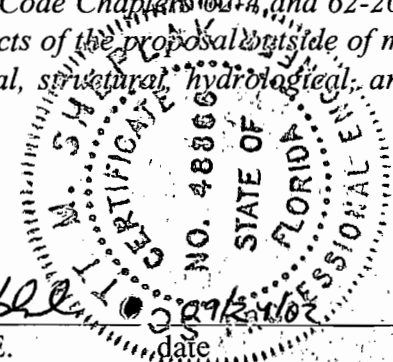
Permittee:

Tropicana Products, Inc.
Bradenton Plant

Permit No.: 0810007-011-AC

Project type: Air Construction Permit for New Gas Turbine

I HEREBY CERTIFY that the engineering features described in the above referenced application 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).


Scott M. Sheplak
Scott M. Sheplak, P.E.
Registration Number: 48866

Permitting Authority:
Department of Environmental Protection
Bureau of Air Regulation
111 South Magnolia Drive, Suite 4
Tallahassee, Florida 32301
Telephone: 850/921-9532
Fax: 850/922-6979



CERTIFIED MAIL-RETURN RECEIPT REQUESTED
August 27, 2002

RECEIVED

AUG 29 2002

BUREAU OF AIR REGULATION

Mr. C. H. Fancy, P.E., Chief
Bureau of Air Regulation
Florida Department of Environmental Protection
Twin Towers Office Building
Mail Station #5505
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Attn: Mr. Ed Svec, P.E.

**RE: Application for Air Permit for Replacement of Gas Turbine
Facility ID #0810007, Emissions Unit ID #016**

Dear Mr. Fancy:

Enclosed please find four copies of our Application for an Air Permit for the replacement of the existing natural gas fired General Electric (GE) LM 5000 gas turbine with a natural gas fired GE LM 6000 gas turbine.

Please call me at 941-742-2748 if there are any questions.

Sincerely,

Douglas Foster
Director, Corporate Environmental & Safety

D543/jb

cc: (letter only)
Ken Kosky, P.E., Golder Associates
Scott Sheplak, FDEP, Tallahassee
Michael Haycock, TPI



DESIGNATION OF DOCUMENT SIGNATORY

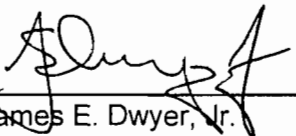
I, James E. Dwyer, Jr., hereby certify that I am the President and Chief Executive Officer of Tropicana Products, Inc., ("Tropicana") and as such I am authorized to designate employees to prepare and sign documents and to certify on behalf of said company the accuracy and completeness of information in such documents.

Pursuant to the power vested in me, I hereby designate the person listed below to prepare and sign reports to the United States Environmental Protection Agency, the United States Department of Labor, Occupational Safety and Health, the Florida Department of Environmental Protection, the Southwest Florida Water Management District, and the County of Manatee, State of Florida, pertinent to the operation of the Tropicana plant located in Bradenton, Florida.

This designation is effective until revoked in writing.

Designated Signatory

Michael W. Haycock
Vice President, Engineering
& Bradenton Manufacturing
1001 13th Avenue East
Bradenton, FL 34208


James E. Dwyer, Jr.
President and CEO

Dated: 7/23/02

RECEIVED

AUG 29 2002

BUREAU OF AIR REGULATION

RECEIVED

AUG 29 2002

BUREAU OF AIR REGULATION

**APPLICATION FOR AIR PERMIT
REPLACEMENT OF GAS TURBINE
FOR TROPICANA PRODUCTS, INC.
BRADENTON CITRUS PROCESSING FACILITY**

Prepared For:

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

Prepared By:

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

**July 2002
0237563**

DISTRIBUTION:

4 Copies - FDEP

2 Copies - Tropicana Products, Inc.

1 Copy - Golder Associates Inc.

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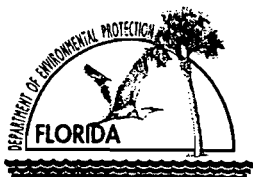
Table 1	Design Information and Stack Parameters for Tropicana Products, Inc., LM 6000 Gas Turbine, Natural Gas, Baseload
Table 2	Maximum Emissions for Criteria Pollutants for Tropicana Products, Inc., LM 6000 Gas Turbine, Natural Gas, Baseload
Table 3	Net Emissions Increases Associated with Tropicana Products LM 6000 Project at Bradenton Citrus Processing Facility

LIST OF ATTACHMENTS

ATTACHMENT A	TITLE V PERMIT CONDITIONS FOR COGENERATION FACILITY
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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, Director, Corporate Environmental & Safety	
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) 742 - 3768	

Application Processing Information (DEP Use)

1. Date of Receipt of Application:	4-29-02
2. Permit Number:	0810007-011-AP
3. PSD Number (if applicable):	
4. Siting Number (if applicable):	

RECEIVED
AUG 29 2002
BUREAU OF AIR REGULATION

Purpose of Application

Air Operation Permit Application

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

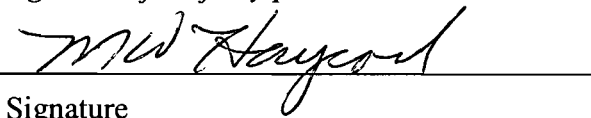
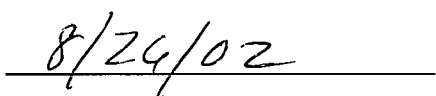
- ☐ Initial Title V air operation permit for an existing facility which is classified as a Title V source.
- ☐ Initial Title V air operation permit for a facility which, upon start up of one or more newly constructed or modified emissions units addressed in this application, would become classified as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

- ☒ 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: Michael Haycock, 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 - 3349 Fax: (941) 749 - 2049
4. Owner/Authorized Representative or Responsible Official Statement: <i>I, the undersigned, am the owner or authorized representative*(check here [X], 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.</i>  Signature  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

* Board of Professional Engineers Certificate of Authorization # 00001670

4. Professional Engineer Statement:

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

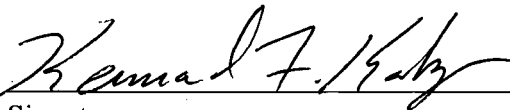
(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this Application for Air Permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions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

8/23/02

Date

(seal) 159

*Attach any exception to certification statement.

Scope of Application

Emissions Unit ID	Description of Emissions Unit	Permit Type	Processing Fee
016	Gas Turbine with HRSG and Duct Burners	AC1D	NA

Application Processing Fee

Check one: ☐ Attached - Amount: \$: _____ ☒ Not Applicable

Construction/Modification Information

1. Description of Proposed Project or Alterations:

Replacement of the existing natural gas fired, General Electric (GE) LM 5000 gas turbine (GT) with a natural gas fired, GE LM 6000 GT. The GT will also comply with 403.08725 F.S.

2. Projected or Actual Date of Commencement of Construction: 1 Sept 2002

3. Projected Date of Completion of Construction: 1 Mar 2003

Application Comment

The replacement unit is addressed as EU16 and includes the following changes:

- 1) The replacement of the LM5000 GT with an LM6000 GT.**
- 2) Modifying heat input, fuel usage, and emission rates that will comply with 403.08725 F.S.**
- 3) There will be no change in the duct burner system installed in the heat recovery steam generator.**

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: 20	6. Facility SIC(s): 2037, 2653, 3221
7. Facility Comment (limit to 500 characters): See Attachment Part II.			

Facility Contact

1. Name and Title of Facility Contact: Mr. George Cassady, Manager, Environmental Operations			
2. Facility Contact Mailing Address: Organization/Firm: Tropicana Products, Inc. Street Address: P.O. Box 338 City: Bradenton State: FL Zip Code: 34206			
3. Facility Contact Telephone Numbers: Telephone: (941) 742 - 2677 Fax: (941) 742 - 2698			

Facility Regulatory Classifications

Check all that apply:

1. <input type="checkbox"/> Small Business Stationary Source?	<input type="checkbox"/> Unknown
2. <input checked="" type="checkbox"/> Major Source of Pollutants Other than Hazardous Air Pollutants (HAPs)?	
3. <input type="checkbox"/> Synthetic Minor Source of Pollutants Other than HAPs?	
4. <input checked="" type="checkbox"/> Major Source of Hazardous Air Pollutants (HAPs)?	
5. <input type="checkbox"/> Synthetic Minor Source of HAPs?	
6. <input checked="" type="checkbox"/> One or More Emissions Units Subject to NSPS?	
7. <input type="checkbox"/> One or More Emission Units Subject to NESHAP?	
8. <input type="checkbox"/> Title V Source by EPA Designation?	
9. Facility Regulatory Classifications Comment (limit to 200 characters): NSPS Subpart GG does not apply to the gas turbine since it is not an electric utility stationary gas turbine. Subpart Db applies to the HRSG duct burners.	

List of Applicable Regulations

This application will not change any applicable regulations for the facility.	

B. FACILITY POLLUTANTS

List of Pollutants Emitted

1. Pollutant Emitted	2. Pollutant Classif.	3. <u>Requested Emissions Cap</u>		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 <u>Part II</u> [] Not Applicable
7. Supplemental Requirements Comment:

Additional Supplemental Requirements for Title V Air Operation Permit Applications

8. List of Proposed Insignificant Activities: <input type="checkbox"/> Attached, Document ID:_____ <input checked="" type="checkbox"/> Not Applicable
9. List of Equipment/Activities Regulated under Title VI: <input type="checkbox"/> Attached, Document ID:_____ <input type="checkbox"/> Equipment/Activities On site but Not Required to be Individually Listed <input checked="" type="checkbox"/> Not Applicable
10. Alternative Methods of Operation: <input type="checkbox"/> Attached, Document ID:_____ <input checked="" type="checkbox"/> Not Applicable
11. Alternative Modes of Operation (Emissions Trading): <input type="checkbox"/> Attached, Document ID:_____ <input checked="" type="checkbox"/> Not Applicable
12. Identification of Additional Applicable Requirements: <input type="checkbox"/> Attached, Document ID:_____ <input checked="" type="checkbox"/> Not Applicable
13. Risk Management Plan Verification: <input type="checkbox"/> 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:_____) <input type="checkbox"/> Plan to be submitted to CEPPO (Date required:_____) <input checked="" type="checkbox"/> Not Applicable
14. Compliance Report and Plan: <input type="checkbox"/> Attached, Document ID:_____ <input checked="" type="checkbox"/> Not Applicable
15. Compliance Certification (Hard-copy Required): <input type="checkbox"/> Attached, Document ID:_____ <input checked="" type="checkbox"/> 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)			
<input checked="" type="checkbox"/> 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).			
<input type="checkbox"/> 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.			
<input type="checkbox"/> 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)			
<input checked="" type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.			
<input type="checkbox"/> 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):			
Gas turbine with heat recovery steam generator (HRSG) and duct burners (cogeneration unit)			
4. Emissions Unit Identification Number:		<input type="checkbox"/> No ID <input type="checkbox"/> ID Unknown	
ID: 016			
5. Emissions Unit Status Code:	6. Initial Startup Date:	7. Emissions Unit Major Group SIC Code:	8. Acid Rain Unit?
A		49	<input type="checkbox"/>
9. Emissions Unit Comment: (Limit to 500 Characters)			
The cogeneration units consists of a natural gas turbine with a maximum design heat input capacity of 434 MMBtu per hour, and a natural gas-fired duct burner with a maximum design heat input capacity of 104 MMBtu per hour. The cogeneration facility will have an electric generation capacity of 49.9 MW. The HRSG duct burner is subject to Federal NSPS (40 CFR 60 Subpart Db).			

Emissions Unit Control Equipment

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

Low NO_x Burner – Gas2. Control Device or Method Code(s): **25****Emissions Unit Details**

1. Package Unit:

Manufacturer: **General Electric**Model Number: **LM6000**

2. Generator Nameplate Rating:

49.9 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:	456	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):		
Maximum heat input rate based on 52°F, baseload, and HHV. The capacity will be limited to 49.9 MW.		

C. EMISSIONS UNIT REGULATIONS
(Regulated Emissions Units Only)

List of Applicable Regulations

Proposed LM6000 does not change applicable regulations in Title V Permit.	

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): Gases from the CT/HRSG exhaust through a single stack.			
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common: Emission Unit 016			
5. Discharge Type Code: V	6. Stack Height: 67 feet	7. Exit Diameter: 12 feet	
8. Exit Temperature: 268 °F	9. Actual Volumetric Flow Rate: 343,880 acfm	10. Water Vapor: %	
11. Maximum Dry Standard Flow Rate: dscfm		12. Nonstack Emission Point Height: feet	
13. Emission Point UTM Coordinates: Zone: East (km): North (km):			
14. Emission Point Comment (limit to 200 characters): Based on exhaust from GT/HRSG at 49.9 MW.			

E. SEGMENT (PROCESS/FUEL) INFORMATION
(All Emissions Units)**Segment Description and Rate:** Segment 1 of 1

1. Segment Description (Process/Fuel Type) (limit to 500 characters): Internal Combustion Engines – Commercial / Institutional – Natural Gas - Turbine		
2. Source Classification Code (SCC): 2-03-002-02		3. SCC Units: Million Cubic Feet Burned
4. Maximum Hourly Rate: 0.432	5. Maximum Annual Rate: 3,580	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit: 1,054.5
10. Segment Comment (limit to 200 characters): Maximum hourly rate based on 434 MMBtu/hr maximum heat input rate (HHV) at 49.9 MW baseload, and minimum fuel heat content. Maximum annual rate based on 8,760 hours per year at 70°F.		

Segment Description and Rate: Segment _____ of _____

1. Segment Description (Process/Fuel Type) (limit to 500 characters):		
2. Source Classification Code (SCC):		3. SCC Units:
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment (limit to 200 characters):		

**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			EL
SO ₂			EL
NO _x	025		EL
CO			EL
PM ₁₀			EL
VOC			EL

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: 3 lb/hour 13.1 tons/year	4. Synthetically Limited? <input type="checkbox"/>	
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 _____ to _____ tons/year		
6. Emission Factor: 3 lb/hr Reference: GE, 2002.		7. Emissions Method Code: 2
8. Calculation of Emissions (limit to 600 characters): See Part II, Appendix A.		
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):		

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: OTHER	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: 3 lb/hr	4. Equivalent Allowable Emissions: 3 lb/hour 13.1 tons/year
5. Method of Compliance (limit to 60 characters): None required	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): See Part II.	

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

Potential/Fugitive Emissions

1. Pollutant Emitted: SO₂		2. Total Percent Efficiency of Control:	
3. Potential Emissions: 1.3 lb/hour 5.2 tons/year		4. Synthetically Limited? <input type="checkbox"/>	
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 _____ to _____ tons/year			
6. Emission Factor: 1 grain S/100 cf Reference: Permit Limit*		7. Emissions Method Code: 2	
8. Calculation of Emissions (limit to 600 characters): See Part II, Appendix A.			
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): *AC41-157745/PSD-FL-136/0810007-003-AV. The use of natural gas not limited pursuant to 403.08725 F.S.			

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: OTHER		2. Future Effective Date of Allowable Emissions:	
3. Requested Allowable Emissions and Units: 1 grain S/100cf		4. Equivalent Allowable Emissions: 1.3 lb/hour 5.2 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): See 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: 39.7 lb/hour 164.6 tons/year	4. Synthetically Limited? []
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 _____ to _____ tons/year	
6. Emission Factor: 25 ppmvd @ 15% O₂ Reference: GE, 2002.	7. Emissions Method Code: 2
8. Calculation of Emissions (limit to 600 characters): See Part II, Appendix A.	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):	

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: OTHER	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: 25 ppmvd @ 15% O₂	4. Equivalent Allowable Emissions: 39.7 lb/hour 164.6 tons/year
5. Method of Compliance (limit to 60 characters): Annual compliance test, EPA Method 7E	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): See 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: 28.5 lb/hour 119.2 tons/year		4. Synthetically Limited? <input type="checkbox"/>	
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 _____ to _____ tons/year			
6. Emission Factor: 30 ppmvd @ 15% O₂ Reference: GE, 2002		7. Emissions Method Code: 2	
8. Calculation of Emissions (limit to 600 characters): See Part II, Appendix A.			
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):			

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: OTHER		2. Future Effective Date of Allowable Emissions:	
3. Requested Allowable Emissions and Units: 30 ppmvd @ 15% O₂		4. Equivalent Allowable Emissions: 28.5 lb/hour 119.2 tons/year	
5. Method of Compliance (limit to 60 characters): None Required			
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): See Part II.			

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

Potential/Fugitive Emissions

1. Pollutant Emitted: PM₁₀		2. Total Percent Efficiency of Control:	
3. Potential Emissions: 3 lb/hour 13.1 tons/year		4. Synthetically Limited? []	
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 _____ to _____ tons/year			
6. Emission Factor: 3 lb/hr Reference: GE, 2002.		7. Emissions Method Code: 2	
8. Calculation of Emissions (limit to 600 characters): See Part II, Appendix A.			
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):			

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: OTHER		2. Future Effective Date of Allowable Emissions:	
3. Requested Allowable Emissions and Units: 3 lb/hr		4. Equivalent Allowable Emissions: 3 lb/hour 13.1 tons/year	
5. Method of Compliance (limit to 60 characters): None Required			
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): See Part II.			

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

Potential/Fugitive Emissions

1. Pollutant Emitted: VOC	2. Total Percent Efficiency of Control:
3. Potential Emissions: 3.1 lb/hour 12.9 tons/year	4. Synthetically Limited? <input type="checkbox"/>
5. Range of Estimated Fugitive Emissions: <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 _____ to _____ tons/year	
6. Emission Factor: 5 ppmvw Reference: GE, 2002.	7. Emissions Method Code: 0
8. Calculation of Emissions (limit to 600 characters): See Part II, Appendix A.	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):	

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: OTHER	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: 5 ppmvw	4. Equivalent Allowable Emissions: 3.1 lb/hour 12.9 tons/year
5. Method of Compliance (limit to 60 characters): None Required	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): See 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: VE10	2. Basis for Allowable Opacity: <input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other
3. Requested Allowable Opacity: Normal Conditions: 10 % Exceptional Conditions: 100 % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance: Annual VE Test EPA Method 9	
5. Visible Emissions Comment (limit to 200 characters): VE of 10% proposed for gas firing. Excess opacity based on Rule 62-210.700(1) for startup/shutdown/malfunction for 2 hrs/24 hrs. VE limit complies with 403.08725 F.S.	

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:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information: Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment (limit to 200 characters):	

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 [X] Attached, Document ID: Part II [] 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:_____ [X] Not Applicable
12. Alternative Modes of Operation (Emissions Trading) [] Attached, Document ID:_____ [X] Not Applicable
13. Identification of Additional Applicable Requirements [] Attached, Document ID:_____ [X] Not Applicable
14. Compliance Assurance Monitoring Plan [] Attached, Document ID:_____ [X] 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:_____ [X] Not Applicable

PART II

SUPPORTING INFORMATION

1.0 INTRODUCTION

Tropicana Products, Inc. is proposing to replace the General Electric (GE) LM 5000 gas turbine, associated with the cogeneration facility, with a GE LM 6000 at the existing Bradenton Citrus Processing Plant. The gas turbine was part of the cogeneration facility permitted by the Florida Department of Environmental Protection (FDEP) on May 30, 1989 pursuant to permit numbers AC41-157745 and PSD-FL-136. Prevention for Significant Deterioration (PSD) review was required for nitrogen oxides and carbon monoxide. Attachment A presents the existing Title V permit conditions for the cogeneration unit that includes the gas turbine.

The cogeneration unit currently consists of a General Electric LM 5000 gas turbine with a 45.4 megawatt (MW) electric generator, an associated heat recovery steam generator (HRSG) with a duct burner system. The steam produced by the turbine exhaust and duct burners is used as process steam in the Tropicana plant and replaced the steam previously generated by six boilers. These boilers were shut down after the cogeneration unit became operational. The existing gas turbine is being replaced due to the availability of parts for the LM 5000 and due to the fact that the LM 6000 is a more efficient gas turbine. GE no longer manufactures the LM 5000. The LM 6000 will have a maximum generating capability of 49.9 MW.

Tropicana is seeking a minor source air construction permit for this project.

1.1 EXISTING FACILITY

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), one glass plant (one glass plant was closed in 2000), cogeneration facility [including combustion turbine, HRSG, duct burner, auxiliary boiler, and a sanitary process steam boiler (used to produce 5-fold citrus oil)], and a wastewater treatment system (including a package steam boiler and an anaerobic reactor with a biogas flare).

The facility operates under a Title V permit issued by FDEP on February 27, 2000 (Final Permit No. 0810007-003-AV).

1.2 LM 6000 GAS TURBINE

The project will consist of replacing the existing LM 5000 with a LM 6000. Design information and stack parameters for the LM 6000 are presented in Table 1. The maximum heat input for the LM 6000 is 456 million British thermal units per hour (MMBtu/hr) on a high heating value (HHV) basis. The current maximum heat input that is authorized for the LM 5000 is 425.5 MMBtu/hr.

The potential hourly and annual criteria pollutant emissions associated with the LM 6000 are provided in Table 2. The maximum hourly emissions are based on the maximum heat input rate of 456 MMBtu/hr at a capacity of 49.9 MW. The maximum potential emissions of nitrogen oxides (NO_x) and volatile organic compounds (VOCs) from the LM 6000 will be lower than those authorized for the LM 5000. For NO_x, the maximum potential emissions from the LM 6000 will be 39.7 pounds per hour (lb/hr) [25 parts per million by volume dry (ppmvd) corrected to 15-percent oxygen (O₂)] compared to the LM 5000 of 62.6 lb/hr (42 ppmvd corrected to 15-percent O₂). Maximum VOC emissions from the LM 6000 will be 3.07 lb/hr compared to the currently authorized 3.6 lb/hr for the LM 5000. Emissions of sulfur dioxide (SO₂), particulate matter (PM) [including PM less than ten microns (PM₁₀)], and carbon monoxide (CO) from the LM 6000 will be higher than that authorized for the LM 5000. For SO₂, the maximum potential emissions from the LM 6000 will be 1.3 lb/hr compared to that authorized for the LM 5000 of 1.2 lb/hr. Maximum PM/PM₁₀ emissions from the LM 6000 will be 3.0 lb/hr compared to the currently authorized 1.5 lb/hr for the LM 5000. The maximum potential emissions for CO will increase from the 9.1 lb/hr currently authorized for the LM 5000 to 28.5 lb/hr for the LM 6000. The emission increase for CO is an artifact of the lower NO_x emissions for the LM 6000 as compared to the LM 5000.

1.3 APPLICABLE REQUIREMENTS AND PERMITTING CONDITIONS

The proposed project is a modification and the PSD requirements in Rule 62-212.400 Florida Administrative Code (F.A.C.) may be applicable. PSD review would potentially apply for a modification to the Bradenton facility if the increase in the emissions from the "Project" exceed the PSD thresholds. A modification is defined in Rule 62-210.200 F.A.C. as any physical change in, addition to or change in, the method of operation of 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 physical

change or a change in the method of operation does not include routine replacement, repair or replacement of component parts of an emission unit. The substitution of the LM 6000 for the LM 5000 is not a routine replacement since the entire gas turbine will be a different and larger gas turbine. 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 PSD rules codified in Rule 62-212.400 F.A.C. However, if the potential emissions of the project, which includes the decreases in actual emissions afforded by the removal of the LM 5000 are less than the significant emission rates, then PSD review would not otherwise apply. Table 3 presents the potential emission of the LM 6000 along with the actual decreases in emissions from the LM 5000. The project consisting of the potential emissions of the LM 6000 minus the actual emissions of the LM 5000 is below the significant emission rates for all pollutants. Therefore, PSD is not applicable for the project.

Table 1. Design Information and Stack Parameters for Tropicana Products, Inc.
LM6000 Gas Turbine, Natural Gas, Baseload

Parameter	Turbine Inlet Temperature			
	52°F	60°F	70°F	90°F
Combustion Turbine Performance				
Power output (MW)	49.9	48.4	46.4	42.5
Heat rate (Btu/kWh, LHV)	8,235	8,281	8,374	8,559
(Btu/kWh, HHV)	9,141	9,192	9,295	9,500
Heat Input (MMBtu/hr, LHV)	411	401	389	364
(MMBtu/hr, HHV)	456	445	431	403
Fuel heating value (Btu/lb, LHV)	19,000	19,000	19,000	19,000
(Btu/lb, HHV)	21,090	21,090	21,090	21,090
(HHV/LHV)	1.110	1.110	1.110	1.110
Steam Injection (lb/hr)	34,956	32,999	32,999	25,588
CT Exhaust Flow				
Mass Flow (lb/hr)- with no margin	1,073,600	1,053,720	1,027,100	973,080
- provided	814	816	819	825
Temperature (°F)	11.46	11.54	11.81	12.34
Moisture (% Vol.)	13.19	13.21	13.18	13.14
Oxygen (% Vol.)	27.99	27.98	27.95	27.89
Molecular Weight				
Fuel Usage				
Fuel usage (lb/hr) = Heat Input (MMBtu/hr) x 1,000,000	411	401	389	364
Heat input (MMBtu/hr, LHV)	19,000	19,000	19,000	19,000
Heat content (Btu/lb, LHV)	21,630	21,099	20,447	19,132
Fuel usage (lb/hr)- calculated				
Turbine Flow Conditions				
Turbine Flow (acfm) = [(Mass Flow (lb/hr) x 1,545 x 1,073,600	1,073,600	1,053,720	1,027,100	973,080
Mass flow (lb/hr)	814	816	819	825
Temperature (°F)	27.99	27.98	27.95	27.89
Molecular weight	601,790	591,812	578,854	552,198
Volume flow (acfm)- calculated	89	87	85	81
Velocity (ft/s)- calculated				
HRSG Stack				
Stack height (ft)	67	67	67	67
Diameter (ft)	12	12	12	12
Temperature (°F)	268	268	268	268
Volume flow (acfm)- calculated	343,880	337,648	329,481	312,841
Velocity (ft/s)- calculated	51	50	49	46
	51	50	49	46

Note: Universal gas constant = 1,545 ft-lb(force)/°R; atmospheric pressure = 2,090.9 lb(force)/ft²; 14.52 lb/in²
A margin of 5% was added to heat rate.

Source: GE, 2002.

Table 2. Maximum Emissions for Criteria Pollutants for Tropicana Products Inc.
LM6000 Gas Turbine, Natural Gas, Baseload

Parameter	Turbine Inlet Temperature			
	52°F	60°F	70°F	90°F
Hours of Operation	8,760	8,760	8,760	8,760
Particulate (lb/hr) = Emission rate (lb/hr) from manufacturer (filterable)				
Basis (excludes H ₂ SO ₄), lb/hr	3.00	3.00	3.00	3.00
CT Emission rate (lb/hr)	3.0	3.0	3.0	3.0
(TPY)	13.1	13.1	13.1	13.1
Sulfur Dioxide (lb/hr) = Natural gas (cf/hr) x sulfur content(gr/100 cf) x 1 lb/7000 gr x (lb SO ₂ /lb S) /100				
Fuel density (lb/cf)	0.0489	0.0489	0.0489	0.0489
Fuel use (cf/hr)	442,032	431,190	417,863	390,985
Sulfur content (grains/ 100 cf)	1	1	1	1
lb SO ₂ /lb S (64/32)	2	2	2	2
Emission rate (lb/hr)	1.3	1.2	1.2	1.1
(TPY)	5.53	5.40	5.23	4.89
Nitrogen Oxides (lb/hr) = NO _x (ppm) x [(20.9 x (1 - Moisture(%)/100)) - Oxygen(%)] x 2090.9 x Volume flow (acfm) x 46 (mole. wgt NO _x) x 60 min/hr / [1545 x (CT temp.(°F) + 460°F) x 5.9 x 1,000,000 (adj. for ppm)]				
CT, ppmvd @15% O ₂	25	25	25	25
Moisture (%)	11.46	11.54	11.81	12.34
Oxygen (%)	13.2	13.2	13.2	13.1
Turbine Flow (acfm)	601,790	591,812	578,854	552,198
Turbine Exhaust Temperature (°F)	814	816	819	825
CT Emission rate (lb/hr)	39.7	38.8	37.6	35.3
(TPY)	174.1	169.7	164.6	154.4
Carbon Monoxide (lb/hr) = CO(ppm) x [1 - Moisture(%)/100] x 2090.9 lb/ft ³ x Volume flow (acfm) x 28 (mole. wgt CO) x 60 min/hr / [1545 x (CT temp.(°F) + 460°F) x 1,000,000 (adj. for ppm)]				
Basis, ppmvd	30	30	30	30
Basis, ppmvd @ 15% O ₂ - calculated	29.5	29.7	29.7	29.9
Moisture (%)	11.46	11.54	11.81	12.34
Oxygen (%)	13.2	13.2	13.2	13.1
Turbine Flow (acfm)	601,790	591,812	578,854	552,198
Turbine Exhaust Temperature (°F)	814	816	819	825
CT Emission rate (lb/hr)	28.5	28.0	27.2	25.7
(TPY)	125.0	122.6	119.2	112.5
VOCs (lb/hr) = VOC(ppmvw) x 2090.9 lb/ft ³ x Volume flow (acfm) x 16 (mole. weight as methane) x 60 min/hr / [1545 x (CT temp.(°F) + 460°F) x 1,000,000 (adj. for ppm)]				
Basis, ppmvw	5	5	5	5
Basis, ppmvd @ 15% O ₂ - calculated	5.5	5.6	5.6	5.7
Moisture (%)	11.46	11.54	11.81	12.34
Oxygen (%)	13.2	13.2	13.2	13.1
Turbine Flow (acfm)	601,790	591,812	578,854	552,198
Turbine Exhaust Temperature (°F)	814	816	819	825
CT Emission rate (lb/hr)	3.07	3.01	2.94	2.79
(TPY)	13.4	13.2	12.9	12.2
Lead (lb/hr)= NA				
Emission Rate Basis	NA	NA	NA	NA
Emission rate (lb/hr)	NA	NA	NA	NA
(TPY)	NA	NA	NA	NA

Note: ppmvd= parts per million, volume dry, ppmvw= parts per million, volume wet; O₂= oxygen.

Source: GE, 2002; Golder Associates, 2002.

Table 3. Net Emissions Increases Associated with Tropicana Products
LM 6000 Project at Bradenton Citrus Processing Facility

	Emissions (tons/year)				
	CO	NO _x	PM ₁₀	SO ₂	VOC
LM 5000 Actual Emissions ^a					
Year 2000	31.9	144.9	5.3	0.5	12.6
Year 2001	24.6	113.1	4.1	0.4	9.8
2-year Average	28.2	129.0	4.7	0.4	11.2
LM 6000 Potential Emissions ^b	119.2	164.6	13.1	5.2	12.9
Project Net Emissions:	91.0	35.6	8.4	4.8	1.7
PSD SERs	100.0	40.0	15.0	40.0	40.0
PSD Applicable?	No	No	No	No	No

^a from Annual Operating Reports for Air Pollutant Emitting Facility

^b from Table 2 for a turbine inlet temperature of 70 degrees F

Note: SERs = Significant Emission Rates

ATTACHMENT A

**TITLE V PERMIT CONDITIONS FOR DUCT BURNER
AND
MANUFACTURER INFORMATION FOR
THE DUCT BURNER AND CONTROL SYSTEM**

Subsection D. This section addresses the following emissions unit(s).

E.U.

<u>ID No.</u>	<u>Brief Description</u>
-016	Gas Turbine

The natural gas fired General Electric (GE) LM 5000 gas turbine (GT) has a maximum design heat input capacity of 425.5 MMBtu per hour, and a natural gas fired Heat Recovery Steam Generator (HRSG) with a maximum design heat input capacity of 104 MMBtu per hour. The cogeneration project has an electric generation capacity of 45.4 MW.

{Permitting note(s): This emission unit is regulated under NSPS - 40 CFR 60 Subpart Db - Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units, adopted and incorporated by reference in Rule 62-204.800(7)(b)3, F.A.C.; NSPS - 40 CFR 60 Subpart GG - Standards of Performance for Stationary Gas Turbines, adopted and incorporated by reference in Rule 62-204.800(7)(b)39, F.A.C.; and Rule 62-296.405, F.A.C., Fossil Fuel Steam Generators with more than 250 Million Btu per Hour Heat Input. The gas turbine is subject to and shall meet all the applicable requirements of 40 CFR 60 Subpart GG. Based on the heat input capacity of the turbine and the fact that it is not an electric utility stationary gas turbine, the nitrogen oxides standards of 40 CFR 60 Subpart GG do not apply to this source. The heat recovery steam generator duct burner is subject to 40 CFR 60 Subpart Db.}

The following specific conditions apply to the emissions unit(s) listed above:

Essential Potential to Emit (PTE) Parameters

D.1. Capacity.

- The maximum heat input to the Gas Turbine shall not exceed 425.5 MMBtu per hour (405.3 MCF/hr of natural gas).
- The maximum heat input to the Heat Recovery Steam Generator shall not exceed 104 MMBtu per hour (99 MCF/hr of natural gas).
- Heat input to the Heat Recovery Steam Generator shall not exceed 91 MMBtu per hour on a 30 day rolling average basis.

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; Air Construction Permit AC41-157745]

D.2. Methods of Operation - (i.e., Fuels) The Gas Turbine/Heat Recovery Steam Generator shall fire natural gas only. The sulfur content of the fuel (natural gas) used in the Gas Turbine shall not exceed 0.8% by weight.

[Rules 62-4.160(2), 62-204.800(7)(b)39, and 62-213.440(1), F.A.C.; 40 CFR 60.333(b); Air Construction Permit AC41-157745]

Emission Limitations and Standards

D.3. Visible emissions from the Gas Turbine and Heat Recovery Steam Generator shall not exceed 10% opacity.

[Air Construction Permit AC41-157745]

D.4. Carbon monoxide (CO) emissions shall not exceed the following:

- a. 10 ppm (corrected to 15% O₂), dry basis, for the Gas Turbine;
- b. 0.14 pounds/MMBtu for the Heat Recovery Steam Generator.

[BACT Determination of May 29, 1989 in accordance with Rule 62-212.400, F.A.C.]

D.5. Nitrogen oxides (NO_x) emissions shall not exceed the following:

- a. 42 ppm (corrected to 15% O₂), dry basis, for the Gas Turbine;
- b. 0.1 pounds/MMBtu for the Heat Recovery Steam Generator.¹

[BACT Determination of May 29, 1989 in accordance with Rule 62-212.400, F.A.C.]

{¹Permitting Note: Compliance with this BACT limit will also satisfy the less stringent requirements of Subpart Db - 40 CFR 60.44b(a)(4)(i) which specifies a NO_x limit of 0.2 lb/MMBtu for duct burners used in a combined cycle system.}

D.6. Emissions from the Gas Turbine and Heat Recovery Steam Generator shall not exceed any of the following:

Pollutant	Gas Turbine		Heat Recovery Steam Generator	
	Pounds per Hour	Tons per Year	Pounds per Hour ¹	Tons per Year ¹
NO _x	62.6	274.6	10.4	39.9
CO	9.1	39.8	14.56	55.8
PM/PM ₁₀	1.5	6.6	0.25	0.95
SO ₂	1.2	2.63	0.29	0.60
VOC	3.6	15.9	4.16	15.9

¹Note: Heat Recovery Steam Generator lb/hr emissions are based on 104 MMBtu/hr maximum heat input rate, while the tons/yr emissions are based on the 91 MMBtu/hr maximum 30 day rolling average heat input rate.

[Air Construction Permit AC41-157745 as amended May 20, 1992]

Test Methods and Procedures

D.7. Test the Gas Turbine/Heat Recovery Steam Generator for emissions of the following pollutants annually on or during the 60 day period prior to March 1.

- a. Visible emissions (VE)
- b. Nitrogen Oxides (NO_x)
- c. Sulfur Dioxide (SO₂)

[Air Construction Permit AC41-157745/PSD-FL-136]

{Permitting Notes: (1) A fuel analysis, including sulfur content, of a representative fuel sample and a calculation of the sulfur dioxide emission rate based on the fuel analysis may be submitted in lieu of the required sulfur oxides emission test. (2) Although CO, PM, and VOC are limited in Condition D.6, the referenced construction permit specified that testing for these pollutants shall be conducted upon initial operation only. (3) The compliance test due date is for planning purposes only. Rule 62-297.310(7)(a)4, F.A.C. allows the permittee to conduct a formal compliance test any time during the federal fiscal year (October 1 – September 30).}

D.8. Compliance with the emission limitations of Conditions D.3 through D.6 shall be determined using the following EPA Methods contained in 40 CFR 60, Appendix A and adopted by reference in Chapter 62-297, F.A.C.

- a. EPA Method 5, 5B, or 17 for PM
- b. EPA Method 201 or 201A for PM₁₀ (recommended)
- c. EPA Method 7/ 20 or 7E for NO_x
- d. EPA Method 9 for VE
- e. EPA Method 10 for CO
- f. EPA Method 25A for VOC

The minimum requirements for stationary point source emission test procedures and reporting shall be in accordance with 40 CFR 60 Appendix A and Chapter 62-297, F.A.C. [Chapter 62-297, F.A.C.; Air Construction Permit AC41-157745]

D.9. The visible emissions tests shall be conducted by a certified observer and be a minimum of sixty (60) minutes in duration. The test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur. [Rule 62-297.310(4)(a), F.A.C.]

D.10. Testing of emissions must be conducted during operation of the Gas Turbine at a heat input rate within 95-100% of the maximum capacity achievable for the average ambient temperature during the compliance tests (or at a heat input rate between 90-100% of the maximum permitted heat input rate of 425 MMBTU per hour) and operation of the Heat Recovery Steam Generator at a heat input rate within 90 to 100% of the maximum

permitted rate of 104 MMBTU per hour. The turbine manufacturer's capacity vs. ambient temperature curve shall be included with the test report. A compliance test submitted at operating rates less than those specified above will automatically constitute

an amended permit at the lesser rates until another test showing compliance at higher rates is submitted. Failure to submit the operating (heat input) rates or operation at conditions that do not represent normal operating conditions may invalidate the test. [Rule 62-4.070(3), F.A.C.]

Operating Conditions

D.11. The sale of electrical output generated by the Gas Turbine/Heat Recovery Steam Generator unit shall not exceed one third (33.3%) of the total annual electrical output based on a 12 month rolling average. (This limitation is necessary to insure that this source (emission unit) is not considered an electric utility gas turbine under Subpart GG - 40 CFR 60.331(q).)

[Rule 62-204.800(7)(b)39, F.A.C.; 40 CFR 60.331(q)]

Recordkeeping and Reporting Requirements

D.12. In order to document compliance with the limitations of Condition D.2 and D.6, the permittee shall maintain records of the sulfur content in the natural gas as supplied by the pipeline company. The Department may require the permittee to independently verify the sulfur content of the natural gas whenever the Department does not have reasonable assurance that the sulfur content information provided by the natural gas supplier accurately represents the sulfur content in the natural gas combusted in this source (emission unit). Compliance with the sulfur content standards shall be in accordance with the requirements of Subpart GG - 40 CFR 60.335(d). Proof of compliance with the annual SO₂ limitation (including calculations) shall be submitted along with the annual operating report each year.

[Air Construction Permit AC41-159485 as amended May 20, 1992; Rule 62-204.800(7)(b)39, F.A.C.; 40 CFR 60.335(d)]

D.13. The permittee shall keep records of total electrical generation output and electrical output sold such that compliance with Condition D.11 can be determined.

[Rule 62-213.440, F.A.C.]

D.14. The permittee shall submit quarterly SO₂ excess emission reports in accordance with 40 CFR 60.7(c) and Subpart GG - 40 CFR 60.334(c)(2). If there are no excess emissions during a calendar quarter the permittee shall submit a report stating that no excess emissions occurred during the reporting period.

[Rule 62-204.800(7)(b)39, F.A.C.; 40 CFR 60.334(c)(2)]

D.15. All reports required by 40 CFR 60 shall be submitted to the Air Compliance Sections of the MCEMD and Southwest District Office of the Department. All quarterly reports shall be postmarked by the 30th day following the end of each calendar quarter.
[Rule 62-213.440, F.A.C.]

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Mfg.

Tropicana Products, Inc.

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Bradenton, Florida 34206

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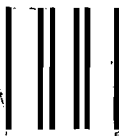
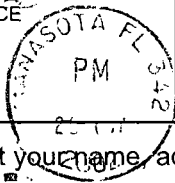
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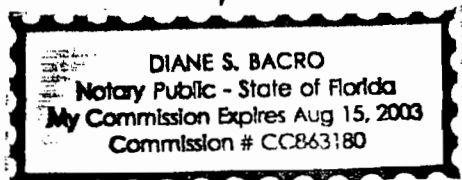
STATE OF FLORIDA COUNTY OF MANATEE;

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

Affiant further says that the said publication is a newspaper published at Bradenton, in said Manatee County, Florida, and that the said newspaper has heretofore been continuously published in said Manatee County, Florida, each day and has been entered as second-class mail matter at the post office in Bradenton, in said Manatee County, Florida for a period of 1 year next preceding the first publication of the attached copy of advertisement; and affiant further says that she has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.

Sandy Riley
(Signature of Affiant)

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



Diane S. Bacro
SEAL & Notary Public

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

**PUBLIC NOTICE OF
INTENT TO ISSUE AIR
CONSTRUCTION PER-
MIT**
**STATE OF FLORIDA
DEPARTMENT OF
ENVIRONMENTAL
PROTECTION**
DEP File No. 0810007-
011-AC

**Tropicana Products,
Inc.**

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

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

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

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

The Department will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57, Florida Statutes (F.S.), before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below. Mediation is not available in this proceeding.

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

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

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

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

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

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

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

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

The complete project file includes the application, technical evaluation, draft permit, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Administrator, Title V Section, or the Department's reviewing engineer for this project, Edward J. Svec, at the Bureau of Air Regulation in Tallahassee, Florida, or call 850/488-0114, for additional information. Written comments directed to the Department's reviewing engineer should be sent to the following mailing address: Dept. of Environmental Protection, Bureau of Air Regulation, Mail Station #5505, Tallahassee, Florida 32399-2400. 9/27/02

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1 Article Addressed to:

Mr. Michael Haycock
Vice President, Manufacturing
Tropicana Products, Inc.
P. O. Box 338
Bradenton, FL 34206

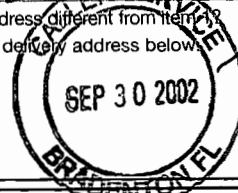
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C. Signature

X *Michael E. Haycock* ☐ Agent ☐ Addressee

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



3. Service Type

- ☒ Certified Mail ☐ Express Mail
☐ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

UNITED STATES POSTAL SERVICE



First-Class Mail
Postage & Fees Paid
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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, ~~MS-5505~~ Title V
2600 Blair Stone Rd., MS-5500
Tallahassee, FL 32399-2400

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