

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
NOTICE OF FINAL PERMIT

In the Matter of an  
Application for Permit by:

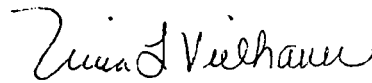
Mr. Michael Haycock, Vice President, Mfg.  
Tropicana Products, Inc.  
PO Box 338  
Bradenton, Florida 34206

DEP File No. 0870007-013-AC  
Biogas Combustion  
Manatee County

Enclosed is Final Permit Number 0870007-013-AC. This permit authorizes Tropicana Products, Inc. to combust all of the biogas produced by the anaerobic reactor in the existing biogas flare, 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.



Trina Vielhauer, Chief  
Bureau of Air Regulation

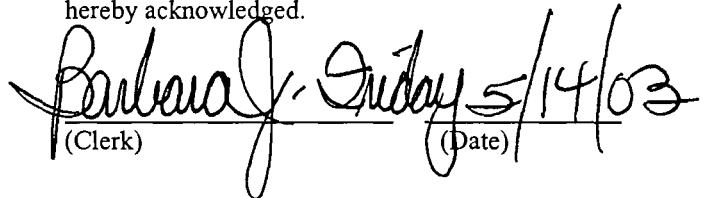
**CERTIFICATE OF SERVICE**

The undersigned duly designated deputy agency clerk hereby certifies that this Notice of Final Permit (including the Final permit) was sent by certified mail (\*) and copies were mailed by U.S. Mail before the close of business on 5/14/03 to the person(s) listed:

Mr. Michael Haycock, Tropicana Products, Inc. \*  
Mr. Ken Kosky, P.E., Golder  
Mr. Eric Peterson, 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.

  
(Clerk) (Date)

**1 APPLICANT NAME AND ADDRESS**

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

Authorized Representative: Michael Haycock, Vice President, Manufacturing

**2 FACILITY DESCRIPTION, PROJECT DETAILS AND RULE APPLICABILITY**

The facility is an existing citrus juice processing facility. Included in the facility is an anaerobic reactor, which is a part of its wastewater treatment system. The biogas produced by the anaerobic digester is currently authorized to be burned in the No. 2 and No. 3 Glass Plants; a small steam boiler; and/or, a biogas flare. The No. 2 Glass Plant (Emissions Unit I.D. No. -012) stopped operation in 2000 and the No. 3 Glass Plant (Emissions Unit I.D. No. -014) is scheduled to stop operation the winter of 2003. The closing of the glass plants will mean the biogas can only be burned in the boiler (Emissions Unit I.D. No. -021) and the flare (Emissions Unit I.D. No. -022). The current Title V permit restricts the total heat input for the biogas flare to 18,659 MMBtu per 12 consecutive months and the boiler to 9.96 MMBtu per hour of natural gas and/or biogas. These restrictions are based on the assumption that the glass plants would combust most of the 187,026 MMBtu annual production of biogas. The project allows all of the biogas produced in a 12 consecutive month period to be burned by the Biogas Flare at the anaerobic reactor (Emissions Unit I.D. No. -022) and the emissions cap associated with the combustion of the biogas to be accounted for at the flare and boiler, only. The applicant did not seek any relaxation in currently enforceable conditions in its existing emissions units.

Emissions units addressed by this permit are:

**E.U. ID**

<b><u>No.</u></b>	<b><u>Brief Description</u></b>
-021	Steam Boiler
-022	Anaerobic Reactor with Biogas Flare

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

<b>Pollutant</b>	<b>Net Increase <sup>1</sup></b>	<b>PSD Significance</b>	<b>Subject to PSD?</b>
SO <sub>2</sub>	26.52	40	No

<sup>1</sup> Potential emissions (shown as net increase) were estimated by the Department from 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, PM<sub>10</sub>, carbon monoxide, SO<sub>2</sub>, 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 SO<sub>2</sub> does not exceed the PSD significance level 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 this pollutant.

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.

### **5 LIMITS AND COMPLIANCE REQUIREMENTS**

The permit maintains the previously established limits on the operation of the boiler and flare, with the exception of the maximum, 12 consecutive month, heat input to the flare. The accounting of sulfur dioxide emissions from combustion of biogas is now calculated at the boiler and flare, only. 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. 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 increase in the combustion of biogas by the flare, 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 April 7, 2003. The "PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT" was published in the Bradenton Herald on April 17, 2003. 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 April 23, 2003.

No comments were received during the fourteen (14) day public comment period. As a result, the permit will be issued, as noticed.

#### **DETAILS OF THIS ANALYSIS MAY BE OBTAINED BY CONTACTING:**

Edward J. Svec, Engineer IV  
Department of Environmental Protection  
Bureau of Air Regulation  
2600 Blair Stone Road, Mail Station #5505  
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

<b>Permit No.</b>	0810007-013-AC
<b>Project</b>	Biogas Combustion
<b>SIC No.</b>	2033, 2037, 2048
<b>Expires:</b>	April 30, 2008

## Authorized Representative:

Michael Haycock, Vice President, Mfg.

## PROJECT AND LOCATION

This permit authorizes Tropicana Products, Inc. to combust a maximum of 187,026 million Btu per 12 consecutive months in the Anaerobic Reactor with Biogas Flare and the Cleaver Brooks Steam Boiler. The project is necessary due to the shutdown of the No. 2 and No. 3 Glass Plants.

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**

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**FACILITY AND PROJECT DESCRIPTION**

The facility is an existing citrus juice processing facility. Included in the facility is an anaerobic reactor, which is a part of its wastewater treatment system. The biogas produced by the anaerobic digester is currently authorized to be burned in the No. 2 and No. 3 Glass Plants; a small steam boiler; and/or, a biogas flare. The No. 2 Glass Plant (Emissions Unit I.D. No. -012) stopped operation in 2000 and the No. 3 Glass Plant (Emissions Unit I.D. No. -014) is scheduled to stop operation the winter of 2003. The closing of the glass plants will mean the biogas can only be burned in the boiler (Emissions Unit I.D. No. -021) and the flare (Emissions Unit I.D. No. -022). The current Title V permit restricts the total heat input for the biogas flare to 18,659 MMBtu per 12 consecutive months and the boiler to 9.96 MMBtu per hour of natural gas and/or biogas. These restrictions are based on the assumption that the glass plants would combust most of the 187,026 MMBtu annual production of biogas. The project allows all of the biogas produced in a 12 consecutive month period to be burned by the Biogas Flare at the anaerobic reactor (Emissions Unit I.D. No. -022) and the emissions cap associated with the combustion of the biogas to be accounted for at the flare and boiler, only. The applicant did not seek any relaxation in currently enforceable conditions in its existing emissions units.

The annual potential emissions associated with this project in tons per year is approximately: SO<sub>2</sub>, 26.52. 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**

February 13, 2003	Received permit application (no application fee required)
February 13, 2003	Application complete
April 7, 2003	Distributed Notice of Intent to Issue and supporting documents
April 17, 2003	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**

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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 are 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.; Florida Administrative Code Chapters 62-4, 62-110, 62-204, 62-210, 62-212, 62-213, 62-296, and 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 April 30, 2008. 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

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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 021, 022) as specified below.
  - (a) Excess emissions resulting from start-up and shutdown are 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.
  - (b) 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.
  - (c) Considering operational variations in types of industrial equipment operations affected by this rule, the Department may adjust maximum and minimum factors to provide reasonable and practical regulatory controls consistent with the public interest.

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

#### COMPLIANCE MONITORING AND TESTING REQUIREMENTS

12. Determination of Process Variables: [Rule 62-297.310(5), F.A.C.]
  - (a) Required Equipment. The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.
  - (b) Accuracy of Equipment. Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured

## AIR CONSTRUCTION PERMIT

### SECTION II. FACILITY-WIDE SPECIFIC CONDITIONS

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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**

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

**E.U.**

<b><u>ID No.</u></b>	<b><u>Brief Description</u></b>
-021	Steam Boiler

The Cleaver Brooks Model No. NCB700-250 package steam boiler is fired with (a) natural gas, (b) biogas, or (c) a mixture of natural gas and biogas. The maximum design heat input rate is 9.96 million Btu per hour.

Sulfur dioxide emissions are controlled by limiting the sulfur content of the biogas.

{Permitting note(s): This emission unit is regulated under Rule 62-212.400, F.A.C., Prevention of Significant Deterioration; 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 Emissions Units.}

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

**Essential Potential to Emit (PTE) Parameters**

**A.1. Capacity.** The maximum heat input to the Steam Boiler shall not exceed 9.96 million Btu per hour. [Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; and, AC41-204588]

**A.2. Methods of Operation - (i.e., Fuels)** The Steam Boiler shall be fired with natural gas and/or biogas only. Biogas and natural gas may be mixed and burned simultaneously. [Rules 62-4.160(2) and 62-213.440(1), F.A.C.; AC41-204588; and, BACT Determination dated October 13, 1992]

**Emission Limitations and Standards**

**A.3.** Visible emissions shall not exceed 20% opacity except for one six-minute period per hour during which opacity shall not exceed 27%. [Rule 62-296.406(1), F.A.C.]

**A.4. Overall SO<sub>2</sub> Emission Limit Cap** - Total sulfur dioxide (SO<sub>2</sub>) emissions from the Anaerobic Reactor w/Biogas Flare, and the Cleaver Brooks Steam Boiler resulting from the combustion of biogas shall not exceed either of the following:

- a. 6.9 pounds per hour on a calendar monthly average basis;
- b. 30.22 tons in any consecutive 12 month period.

[Rule 62-212.400(1)(c), F.A.C.; and, 0810007-013-AC]

## AIR CONSTRUCTION PERMIT

### SECTION III. EMISSIONS UNITS SPECIFIC CONDITIONS

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#### Test Methods and Procedures

**A.5.** Test the visible emissions (VE) from the Steam Boiler exhaust, annually on or during the 60 day period prior to March 18 (See Condition A.6.). [Rule 62-297.310(7)(a)(4), F.A.C.]

**A.6.** Compliance with the emission limitation of Condition A.3 shall be determined using DEP Method 9 contained in Chapter 62-297, F.A.C. The minimum requirements for stack sampling facilities, source sampling and reporting, shall be in accordance with Chapter 62-297, F.A.C., and 40 CFR 60, Appendix A. [Chapter 62-297, F.A.C.]

**A.7.** The sulfur content of the biogas shall be determined in accordance with Tropicana's Environmental Laboratory's Procedure "H<sub>2</sub>S Determination Using Sulfur Chemiluminescence Detector", Reference ASTM Method D 5504-94. [Rule 62-4.070(3), F.A.C.; and, AC41-204588 as amended March 27, 1996]

#### Recordkeeping and Reporting Requirements

**A.8. Additional Recordkeeping Requirements** - To demonstrate compliance with the overall biogas combustion sulfur dioxide (SO<sub>2</sub>) emission limits in this permit, the permittee shall maintain a monthly Biogas SO<sub>2</sub> Emissions Log which shall:

- Record daily biogas production (ft<sup>3</sup> biogas/day), and weekly H<sub>2</sub>S concentration (H<sub>2</sub>S ppmv) results. (Note: Biogas flow measured at 70°F.)
- Calculate total sulfur dioxide emissions resulting from the combustion of biogas in units of pounds per hour on a monthly average basis using the formula shown below. (Note: H<sub>2</sub>S density at 70°F: 0.0892 lb/ft<sup>3</sup>.)
- Calculate total sulfur dioxide (SO<sub>2</sub>) emissions resulting from the combustion of biogas in units of tons per month using the formula shown below.
- Calculate total sulfur dioxide (SO<sub>2</sub>) emissions (tons/year) for the most recent 12 consecutive month period.

The permittee shall complete the calculations in b. through d. by the 15th of the following month. These records shall be recorded in a permanent form suitable for inspection by the Department upon request and shall be retained for at least a five (5) year period.

#### Formulas:

$$\text{MO. AVG. H}_2\text{S ft}^3/\text{ft}^3 \text{ biogas} = (\text{MO. AVG. H}_2\text{S ppmv}) \times 10^{-6}$$

$$\text{Biogas SO}_2 \text{ emissions (lb/hr)} = (\text{MO. AVG. ft}^3 \text{ biogas/day}) \times (1 \text{ day/24 hr}) \times (0.0892 \text{ lb H}_2\text{S/ft}^3 \text{ H}_2\text{S}) \times (\text{MO. AVG. H}_2\text{S ft}^3/\text{ft}^3 \text{ biogas}) \times (64 \text{ lb SO}_2/34 \text{ lb H}_2\text{S})$$

$$\text{Biogas SO}_2 \text{ emissions (tons/month)} = (\text{Total ft}^3 \text{ biogas/month}) \times (0.0892 \text{ lb H}_2\text{S/ft}^3 \text{ H}_2\text{S}) \times (\text{MO. AVG. H}_2\text{S ft}^3/\text{ft}^3 \text{ biogas}) \times (64 \text{ lb SO}_2/34 \text{ lb H}_2\text{S}) \times (1 \text{ ton SO}_2/2000 \text{ lb SO}_2)$$

[Rule 62-213.440, F.A.C.; and, 0810007-006-AC]

**AIR CONSTRUCTION PERMIT**  
**SECTION III. EMISSIONS UNITS SPECIFIC CONDITIONS**

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

**E.U.**

**ID No.      Brief Description**

-022      Anaerobic Reactor with Biogas Flare

The Bacardi anaerobic reactor is part of the waste water treatment system. As wastewater is treated in the reactor methane rich biogas is generated. The biogas is compressed and a portion is used to fuel a steam boiler. Any excess biogas is incinerated in a flare (see below).

Air pollutants contained in the biogas, methane (VOC) and H<sub>2</sub>S, are controlled by a John Zink Bio-Gas Flare system. This system is used as a flare to burn biogas in the event of a system upset (malfunction) and during periods of excess biogas production. The flare system is equipped with a pilot burner for system startup and flame stabilization. This pilot burner is fired with natural gas or propane. Sulfur dioxide emissions are controlled by limiting the sulfur content of the biogas.

{Permitting note(s): This emission unit is regulated under Rule 62-212.400, F.A.C., Prevention of Significant Deterioration; and Rule 62-296.320, F.A.C., General Pollutant Emission Limiting Standards.}

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

**Essential Potential to Emit (PTE) Parameters**

**B.1. Capacity.**

- a. The maximum heat input rate of biogas burned in the flare shall not exceed 21.35 million Btu per hour (MMBtu/hr).
- b. The total heat input to the biogas flare shall not exceed 187,026 MMBtu/12 consecutive month period.

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; and, 0810007-013-AC]

**B.2. Methods of Operation - (i.e., Fuels)** The only fuels authorized to be burned in the flare are biogas generated in the anaerobic reactor, and natural gas or propane used to fire the pilot burner. Biogas generated as a byproduct of the anaerobic reactor shall be burned as a fuel for the hot water boiler, with the biogas flare used to incinerate excess biogas in the event of a system malfunction or during periods of excess biogas production. [Rules 62-4.160(2) and 62-213.440(1), F.A.C.]

**Emission Limitations and Standards**

**B.3.** Visible emissions from the biogas flare shall not be equal to or exceed 20% opacity. [AC41-204587; and, Rule 62-296.320(4)(b), F.A.C.]

**B.4. Overall SO<sub>2</sub> Emission Limit Cap** - Total sulfur dioxide (SO<sub>2</sub>) emissions from the Anaerobic Reactor w/Biogas Flare and the Cleaver Brooks Steam Boiler resulting from the combustion of biogas shall not exceed either of the following:

## AIR CONSTRUCTION PERMIT

### SECTION III. EMISSIONS UNITS SPECIFIC CONDITIONS

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- a. 6.9 pounds per hour on a calendar monthly average basis;
  - b. 30.22 tons in any consecutive 12 month period.
- [Rule 62-212.400(1)(c), F.A.C.; and, 0810007-013-AC]

#### **Test Methods and Procedures**

**B.5.** Test the visible emissions (VE) from the anaerobic reactor biogas flare annually on or during the 60 day period prior to March 18 (See Condition B.6.). [Rule 62-297.310(7)(a)(4), F.A.C.]

**B.6.** Compliance with the emission limitation of Condition B.3 shall be determined using DEP Method 9 contained in Chapter 62-297, F.A.C. The test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur. The minimum requirements for stack sampling facilities, source sampling and reporting, shall be in accordance with Chapter 62-297, F.A.C. and 40 CFR 60, Appendix A. [Chapter 62-297, F.A.C.]

**B.7.** The sulfur content of the biogas shall be determined in accordance with Tropicana's Environmental Laboratory's Procedure "H<sub>2</sub>S Determination Using Sulfur Chemiluminescence Detector", Reference ASTM Method D 5504-94. [AC41-204587 as amended March 27, 1996; and, Rule 62-4.070(3), F.A.C.]

#### **Recordkeeping and Reporting Requirements**

**B.8. Additional Recordkeeping Requirements** - To demonstrate compliance with the overall biogas combustion sulfur dioxide (SO<sub>2</sub>) emission limits in this permit, the permittee shall maintain a monthly Biogas SO<sub>2</sub> Emissions Log which shall:

- a. Record daily biogas production (ft<sup>3</sup> biogas/day), and weekly H<sub>2</sub>S concentration (H<sub>2</sub>S ppmv) results. (Note: Biogas flow measured at 70°F.)
- b. Calculate total sulfur dioxide emissions resulting from the combustion of biogas in units of pounds per hour on a monthly average basis using the formula shown below. (Note: H<sub>2</sub>S density at 70°F: 0.0892 lb/ft<sup>3</sup>.)
- c. Calculate total sulfur dioxide (SO<sub>2</sub>) emissions resulting from the combustion of biogas in units of tons per month using the formula shown below.
- d. Calculate total sulfur dioxide (SO<sub>2</sub>) emissions (tons/year) for the most recent 12 consecutive month period.

The permittee shall complete the calculations in b. through d. by the 15th of the following month. These records shall be recorded in a permanent form suitable for inspection by the Department upon request and shall be retained for at least a five (5) year period.

#### **Formulas:**

$$\text{MO. AVG. H}_2\text{S ft}^3/\text{ft}^3 \text{ biogas} = (\text{MO. AVG. H}_2\text{S ppmv}) \times 10^{-6}$$

$$\text{Biogas SO}_2 \text{ emissions (lb/hr)} = (\text{MO. AVG. ft}^3 \text{ biogas/day}) \times (1 \text{ day/24 hr}) \times (0.0892 \text{ lb H}_2\text{S/ft}^3 \text{ H}_2\text{S}) \times (\text{MO. AVG. H}_2\text{S ft}^3/\text{ft}^3 \text{ biogas}) \times (64 \text{ lb SO}_2/34 \text{ lb H}_2\text{S})$$

**AIR CONSTRUCTION PERMIT**

**SECTION III. EMISSIONS UNITS SPECIFIC CONDITIONS**

---

Biogas SO<sub>2</sub> emissions (tons/month) = (Total ft<sup>3</sup> biogas/month) x (0.0892 lb H<sub>2</sub>S/ft<sup>3</sup> H<sub>2</sub>S) x (MO. AVG. H<sub>2</sub>S ft<sup>3</sup>/ft<sup>3</sup> biogas) x (64 lb SO<sub>2</sub>/34 lb H<sub>2</sub>S) x (1 ton SO<sub>2</sub>/2000 lb SO<sub>2</sub>)  
[Rule 62-213.440, F.A.C.; and, 0810007-006-AC]

**B.9.** In order to document compliance with Condition G.1, the permittee shall maintain a record of the hours of operation of the biogas flare. This log shall show the

- a. date, start and end time for flare operation;
- b. the reason for use of the flare (i.e. malfunction, excess biogas, etc.);
- c. the estimated maximum flare biogas heat input rate (MMBtu/hour) during the period of use.

These records shall be recorded in a permanent form suitable for inspection by the Department upon request. [Rule 62-213.440, F.A.C.; and, AC41-204587]

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

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- 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.

**SENDER: COMPLETE THIS SECTION**

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

## 1. Article Addressed to:

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

## 2. Article Number

(Transfer from service label) 7000 2870 0000 7028 1013

**COMPLETE THIS SECTION ON DELIVERY**

## A. Signature

x *Earl E. Almitas*

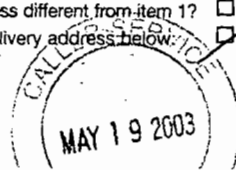
☒ Agent☐ Addressee

## B. Received by (Printed Name)

*EARL E. ALMITAS*

## C. Date of Delivery

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



## 3. Service Type

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

## 4. Restricted Delivery? (Extra Fee)

☐ Yes

PS Form 3811, August 2001

Domestic Return Receipt

102595-02-M-1540

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

Mr. Michael Haycock, Vice President, Mfg.

Postage

\$

Certified Fee

Return Receipt Fee  
(Endorsement Required)Restricted Delivery Fee  
(Endorsement Required)

Total Postage &amp; Fees

\$

Postmark  
Here

## Sent To

Mr. Michael Haycock, Vice President, Mfg.

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

P. O. Box 338

City, State, ZIP+

Bradenton, FL 34206

PS Form 3800, May 2000

See Reverse for Instructions




# Memorandum

# Florida Department of Environmental Protection

---

TO: Howard L. Rhodes

FROM: Trina Vielhauer 

DATE: May 5, 2003

SUBJECT: Tropicana Products, Inc.  
Biogas Combustion  
DEP File No: 0810007-013-AC

Attached for approval and signature is a final air construction permit for Tropicana Products, Inc., Bradenton Plant. The permit allows the biogas previously combusted in the glass furnaces to be combusted by the existing biogas flare. The change was necessary due to the permanent shutdown of the glass furnaces. The applicant did not seek any relaxation in currently enforceable conditions in its other existing emissions units.

No comments were received during the public comment period.

I recommend your approval and signature.

June 12, 2003 is day 90.

TV/es  
Attachments



VIA AIRBORNE EXPRESS  
April 22, 2003

RECEIVED

APR 23 2003

BUREAU OF AIR REGULATION

Edward J. Svec, P.E.  
Bureau of Air Regulation  
Florida Dept. of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

**RE: DEP FILE NO. 0810007-013AC  
BIOGAS COMBUSTION**

Dear Mr. Svec:

Enclosed please find an affidavit of publication of the Notice of Intent to Issue Air Construction Permit to Tropicana Products, Inc., for the combustion of biogas by the Biogas Flare at the anaerobic reactor for a 12 consecutive month period at our Bradenton facility.

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

Sincerely,

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

Douglas E. Foster  
Director, Corporate Environmental & Safety

jlb

Enclosure

# BRADENTON HERALD

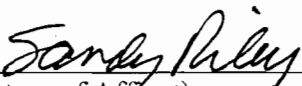
www.bradenton.com  
P.O. Box 921  
Bradenton, FL 34206-0921  
102 Manatee Avenue West  
Bradenton, FL 34205-8894  
941/748-0411 ext. 7065

Bradenton Herald  
Published Daily  
Bradenton, Manatee, Florida

## STATE OF FLORIDA COUNTY OF MANATEE;

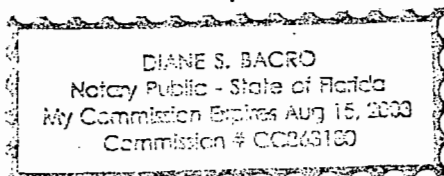
Before the undersigned authority personally appeared Sandy Riley, who on oath says that she is a Legal Advertising Representative of the Bradenton Herald, a daily newspaper published at Bradenton in Manatee County, Florida; that the attached copy of the advertisement, being a Legal Advertisement in the matter of **PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT** in the Court, was published in said newspaper in the issues of, **4/17,'03**

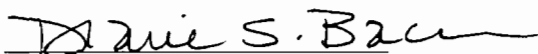
Affiant further says that the said publication is a newspaper published at Bradenton, in said Manatee County, Florida, and that the said newspaper has heretofore been continuously published in said Manatee County, Florida, each day and has been entered as second-class mail matter at the post office in 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.

  
(Signature of Affiant)

Sworn to and subscribed before me this

17th Day of April, 2003





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-  
013-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: P.O. Box 338, Bradenton, Florida 34206. The project is to allow all of the biogas produced in a 12 consecutive month period to be burned by the Biogas Flare at the anaerobic reactor (Emissions Unit I.D.No.-022). The emissions cap associated with the combustion of the biogas will be accounted for at the flare and boiler, only.

Total emissions increase of sulfur dioxide from the combustion of all of the biogas produced in a 12 month period authorized by this permit will not exceed 26.52 tons per year. 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

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, 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 & 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, including the specific facts the petitioner contends warrant reversal or modification of the agency's action; and

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

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

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

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:  
Department of Environmental Protection  
Bureau of Air Regulation  
Suite 4, 111 S. Magnolia Dr.

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 Department's 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 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

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.  
4/17/03



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

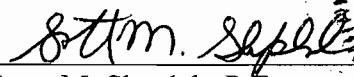
**Permittee:**

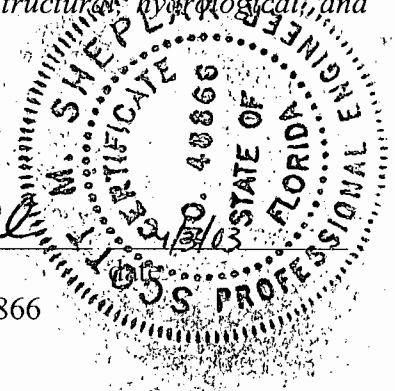
Tropicana Products, Inc.  
Bradenton Plant

**Permit No.:** 0810007-013-AC

**Project type:** Air Construction Permit for Biogas Combustion

***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, P.E.  
Registration Number: 48866

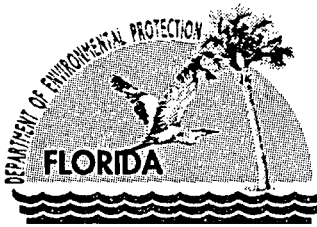


Permitting Authority:

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

"More Protection, Less Process"

Printed on recycled paper.



Jeb Bush  
Governor

# Department of Environmental Protection

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

David B. Struhs  
Secretary

April 4, 2003

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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

Re: DEP File No. 0810007-013-AC  
Biogas Combustion

Dear Mr. Haycock:

Enclosed is one copy of the draft air construction permit to Tropicana Products, Inc. to allow all of the biogas produced in a 12 consecutive month period to be burned by the Biogas Flare at the anaerobic reactor (Emissions Unit I.D. No. -022) and the emissions cap associated with the combustion of the biogas to be accounted for at the flare and boiler, only, at the existing 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,

Trina Vielhauer, Chief  
Bureau of Air Regulation

TV/es

Enclosures

"More Protection, Less Process"

Printed on recycled paper.

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. 0810007-013-AC  
Biogas Combustion  
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 February 13, 2003, 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 to allow all of the biogas produced in a 12 consecutive month period to be burned by the Biogas Flare at the anaerobic reactor (Emissions Unit I.D. No. -022). The emissions cap associated with the combustion of the biogas will be accounted for at the flare and boiler, only.

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.

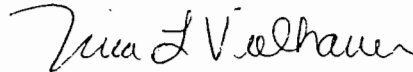
The Department will grant a variance or waiver when the petition demonstrates both that the application of the rule would create a substantial hardship or violate principles of fairness, as each of those terms is defined in Section



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.



Trina Vielhauer, Chief  
Bureau of Air Regulation

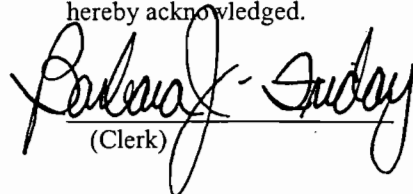
**CERTIFICATE OF SERVICE**

The undersigned duly designated deputy agency clerk hereby certifies that this Intent to Issue Air Construction Permit (including the Public Notice of Intent to Issue Air Construction Permit, Technical Evaluation and Preliminary Determination, and the Draft permit) was sent by certified mail (\*) and copies were mailed by U.S. Mail before the close of business on 4/7/03 to the person(s) listed:

Mr. Michael Haycock, Tropicana Products, Inc. \*  
Mr. Ken Kosky, P.E., Golder  
Mr. Eric Peterson, 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.

 4/7/03  
(Clerk) (Date)

**PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT**

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

DEP File No. 0810007-013-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 to allow all of the biogas produced in a 12 consecutive month period to be burned by the Biogas Flare at the anaerobic reactor (Emissions Unit I.D. No. -022). The emissions cap associated with the combustion of the biogas will be accounted for at the flare and boiler, only.

Total emissions increase of sulfur dioxide from the combustion of all of the biogas produced in a 12 month period authorized by this permit will not exceed 26.52 tons per year. 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

**1 APPLICANT NAME AND ADDRESS**

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

Authorized Representative: Michael Haycock, Vice President, Manufacturing

**2 FACILITY DESCRIPTION, PROJECT DETAILS AND RULE APPLICABILITY**

The facility is an existing citrus juice processing facility. Included in the facility is an anaerobic reactor, which is a part of its wastewater treatment system. The biogas produced by the anaerobic digester is currently authorized to be burned in the No. 2 and No. 3 Glass Plants; a small steam boiler; and/or, a biogas flare. The No. 2 Glass Plant (Emissions Unit I.D. No. -012) stopped operation in 2000 and the No. 3 Glass Plant (Emissions Unit I.D. No. -014) is scheduled to stop operation the winter of 2003. The closing of the glass plants will mean the biogas can only be burned in the boiler (Emissions Unit I.D. No. -021) and the flare (Emissions Unit I.D. No. -022). The current Title V permit restricts the total heat input for the biogas flare to 18,659 MMBtu per 12 consecutive months and the boiler to 9.96 MMBtu per hour of natural gas and/or biogas. These restrictions are based on the assumption that the glass plants would combust most of the 187,026 MMBtu annual production of biogas. The project allows all of the biogas produced in a 12 consecutive month period to be burned by the Biogas Flare at the anaerobic reactor (Emissions Unit I.D. No. -022) and the emissions cap associated with the combustion of the biogas to be accounted for at the flare and boiler, only. The applicant did not seek any relaxation in currently enforceable conditions in its existing emissions units.

Emissions units addressed by this permit are:

**E.U. ID**

**No.      Brief Description**

-021      Steam Boiler  
-022      Anaerobic Reactor with Biogas Flare

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

<b>Pollutant</b>	<b>Net Increase <sup>1</sup></b>	<b>PSD Significance</b>	<b>Subject to PSD?</b>
SO <sub>2</sub>	26.52	40	No

<sup>1</sup> Potential emissions (shown as net increase) were estimated by the Department from 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, PM<sub>10</sub>, carbon monoxide, SO<sub>2</sub>, 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 SO<sub>2</sub> does not exceed the PSD significance level 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 this pollutant.

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.

### **5 LIMITS AND COMPLIANCE REQUIREMENTS**

The permit maintains the previously established limits on the operation of the boiler and flare, with the exception of the maximum, 12 consecutive month, heat input to the flare. The accounting of sulfur dioxide emissions from combustion of biogas is now calculated at the boiler and flare, only. 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. The operating limits and the compliance requirements are detailed in Section III of the permit.

### **6 PRELIMINARY DETERMINATION**

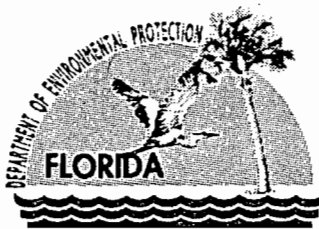
Based on the foregoing technical evaluation of the application and additional information submitted by the applicant and other available information, the Department has made a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations. The Department's preliminary determination is to issue the draft permit to allow the increase in the combustion of biogas by the flare, 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



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

<b>Permit No.</b>	0810007-013-AC
<b>Project</b>	Biogas Combustion
<b>SIC No.</b>	2033, 2037, 2048
<b>Expires:</b>	^DRAFT

## Authorized Representative:

Michael Haycock, Vice President, Mfg.

## PROJECT AND LOCATION

This permit authorizes Tropicana Products, Inc. to combust a maximum of 187,026 million Btu per 12 consecutive months in the Anaerobic Reactor with Biogas Flare and the Cleaver Brooks Steam Boiler. The project is necessary due to the shutdown of the No. 2 and No. 3 Glass Plants.

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

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Howard L. Rhodes, Director  
Division of Air Resource  
Management

**AIR CONSTRUCTION PERMIT**  
**SECTION I. FACILITY INFORMATION**

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**FACILITY AND PROJECT DESCRIPTION**

The facility is an existing citrus juice processing facility. Included in the facility is an anaerobic reactor, which is a part of its wastewater treatment system. The biogas produced by the anaerobic digester is currently authorized to be burned in the No. 2 and No. 3 Glass Plants; a small steam boiler; and/or, a biogas flare. The No. 2 Glass Plant (Emissions Unit I.D. No. -012) stopped operation in 2000 and the No. 3 Glass Plant (Emissions Unit I.D. No. -014) is scheduled to stop operation the winter of 2003. The closing of the glass plants will mean the biogas can only be burned in the boiler (Emissions Unit I.D. No. -021) and the flare (Emissions Unit I.D. No. -022). The current Title V permit restricts the total heat input for the biogas flare to 18,659 MMBtu per 12 consecutive months and the boiler to 9.96 MMBtu per hour of natural gas and/or biogas. These restrictions are based on the assumption that the glass plants would combust most of the 187,026 MMBtu annual production of biogas. The project allows all of the biogas produced in a 12 consecutive month period to be burned by the Biogas Flare at the anaerobic reactor (Emissions Unit I.D. No. -022) and the emissions cap associated with the combustion of the biogas to be accounted for at the flare and boiler, only. The applicant did not seek any relaxation in currently enforceable conditions in its existing emissions units.

The annual potential emissions associated with this project in tons per year is approximately: SO<sub>2</sub>, 26.52. 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**

February 13, 2003	Received permit application (no application fee required)
February 13, 2003	Application complete
	Distributed Notice of Intent to Issue and supporting documents
	Notice of Intent published in the XXX

**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**

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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 are 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.; Florida Administrative Code Chapters 62-4, 62-110, 62-204, 62-210, 62-212, 62-213, 62-296, and 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**

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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 021, 022) as specified below.
  - (a) Excess emissions resulting from start-up and shutdown are 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.
  - (b) 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.
  - (c) Considering operational variations in types of industrial equipment operations affected by this rule, the Department may adjust maximum and minimum factors to provide reasonable and practical regulatory controls consistent with the public interest.

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

**COMPLIANCE MONITORING AND TESTING REQUIREMENTS**

12. Determination of Process Variables: [Rule 62-297.310(5), F.A.C.]
  - (a) Required Equipment. The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.
  - (b) Accuracy of Equipment. Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured

## AIR CONSTRUCTION PERMIT

### SECTION II. FACILITY-WIDE SPECIFIC CONDITIONS

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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

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

#### **E.U.**

<b><u>ID No.</u></b>	<b><u>Brief Description</u></b>
-021	Steam Boiler

The Cleaver Brooks Model No. NCB700-250 package steam boiler is fired with (a) natural gas, (b) biogas, or (c) a mixture of natural gas and biogas. The maximum design heat input rate is 9.96 million Btu per hour.

Sulfur dioxide emissions are controlled by limiting the sulfur content of the biogas.

{Permitting note(s): This emission unit is regulated under Rule 62-212.400, F.A.C., Prevention of Significant Deterioration; 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 Emissions Units.}

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

#### **Essential Potential to Emit (PTE) Parameters**

**A.1. Capacity.** The maximum heat input to the Steam Boiler shall not exceed 9.96 million Btu per hour. [Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; and, AC41-204588]

**A.2. Methods of Operation - (i.e., Fuels)** The Steam Boiler shall be fired with natural gas and/or biogas only. Biogas and natural gas may be mixed and burned simultaneously. [Rules 62-4.160(2) and 62-213.440(1), F.A.C.; AC41-204588; and, BACT Determination dated October 13, 1992]

#### **Emission Limitations and Standards**

**A.3.** Visible emissions shall not exceed 20% opacity except for one six-minute period per hour during which opacity shall not exceed 27%. [Rule 62-296.406(1), F.A.C.]

**A.4. Overall SO<sub>2</sub> Emission Limit Cap** - Total sulfur dioxide (SO<sub>2</sub>) emissions from the Anaerobic Reactor w/Biogas Flare, and the Cleaver Brooks Steam Boiler resulting from the combustion of biogas shall not exceed either of the following:

- 6.9 pounds per hour on a calendar monthly average basis;
- 30.22 tons in any consecutive 12 month period.

[Rule 62-212.400(1)(c), F.A.C.; and, 0810007-013-AC]

**AIR CONSTRUCTION PERMIT**  
**SECTION III. EMISSIONS UNITS SPECIFIC CONDITIONS**

---

**Test Methods and Procedures**

**A.5.** Test the visible emissions (VE) from the Steam Boiler exhaust, annually on or during the 60 day period prior to March 18 (See Condition A.6.). [Rule 62-297.310(7)(a)(4), F.A.C.]

**A.6.** Compliance with the emission limitation of Condition A.3 shall be determined using DEP Method 9 contained in Chapter 62-297, F.A.C. The minimum requirements for stack sampling facilities, source sampling and reporting, shall be in accordance with Chapter 62-297, F.A.C., and 40 CFR 60, Appendix A. [Chapter 62-297, F.A.C.]

**A.7.** The sulfur content of the biogas shall be determined in accordance with Tropicana's Environmental Laboratory's Procedure "H<sub>2</sub>S Determination Using Sulfur Chemiluminescence Detector", Reference ASTM Method D 5504-94. [Rule 62-4.070(3), F.A.C.; and, AC41-204588 as amended March 27, 1996]

**Recordkeeping and Reporting Requirements**

**A.8. Additional Recordkeeping Requirements** - To demonstrate compliance with the overall biogas combustion sulfur dioxide (SO<sub>2</sub>) emission limits in this permit, the permittee shall maintain a monthly Biogas SO<sub>2</sub> Emissions Log which shall:

- a. Record daily biogas production (ft<sup>3</sup> biogas/day), and weekly H<sub>2</sub>S concentration (H<sub>2</sub>S ppmv) results. (Note: Biogas flow measured at 70°F.)
- b. Calculate total sulfur dioxide emissions resulting from the combustion of biogas in units of pounds per hour on a monthly average basis using the formula shown below. (Note: H<sub>2</sub>S density at 70°F: 0.0892 lb/ft<sup>3</sup>.)
- c. Calculate total sulfur dioxide (SO<sub>2</sub>) emissions resulting from the combustion of biogas in units of tons per month using the formula shown below.
- d. Calculate total sulfur dioxide (SO<sub>2</sub>) emissions (tons/year) for the most recent 12 consecutive month period.

The permittee shall complete the calculations in b. through d. by the 15th of the following month. These records shall be recorded in a permanent form suitable for inspection by the Department upon request and shall be retained for at least a five (5) year period.

**Formulas:**

$$\text{MO. AVG. H}_2\text{S ft}^3/\text{ft}^3 \text{ biogas} = (\text{MO. AVG. H}_2\text{S ppmv}) \times 10^{-6}$$

$$\text{Biogas SO}_2 \text{ emissions (lb/hr)} = (\text{MO. AVG. ft}^3 \text{ biogas/day}) \times (1 \text{ day}/24 \text{ hr}) \times (0.0892 \text{ lb H}_2\text{S}/\text{ft}^3 \text{ H}_2\text{S}) \times (\text{MO. AVG. H}_2\text{S ft}^3/\text{ft}^3 \text{ biogas}) \times (64 \text{ lb SO}_2/34 \text{ lb H}_2\text{S})$$

$$\text{Biogas SO}_2 \text{ emissions (tons/month)} = (\text{Total ft}^3 \text{ biogas/month}) \times (0.0892 \text{ lb H}_2\text{S}/\text{ft}^3 \text{ H}_2\text{S}) \times (\text{MO. AVG. H}_2\text{S ft}^3/\text{ft}^3 \text{ biogas}) \times (64 \text{ lb SO}_2/34 \text{ lb H}_2\text{S}) \times (1 \text{ ton SO}_2/2000 \text{ lb SO}_2)$$

[Rule 62-213.440, F.A.C.; and, 0810007-006-AC]

**AIR CONSTRUCTION PERMIT**  
**SECTION III. EMISSIONS UNITS SPECIFIC CONDITIONS**

---

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

**E.U.**

<b><u>ID No.</u></b>	<b><u>Brief Description</u></b>
-022	Anaerobic Reactor with Biogas Flare

The Bacardi anaerobic reactor is part of the waste water treatment system. As wastewater is treated in the reactor methane rich biogas is generated. The biogas is compressed and a portion is used to fuel a steam boiler. Any excess biogas is incinerated in a flare (see below).

Air pollutants contained in the biogas, methane (VOC) and H<sub>2</sub>S, are controlled by a John Zink Bio-Gas Flare system. This system is used as a flare to burn biogas in the event of a system upset (malfunction) and during periods of excess biogas production. The flare system is equipped with a pilot burner for system startup and flame stabilization. This pilot burner is fired with natural gas or propane. Sulfur dioxide emissions are controlled by limiting the sulfur content of the biogas.

{Permitting note(s): This emission unit is regulated under Rule 62-212.400, F.A.C., Prevention of Significant Deterioration; and Rule 62-296.320, F.A.C., General Pollutant Emission Limiting Standards.}

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

**Essential Potential to Emit (PTE) Parameters**

**B.1. Capacity.**

- a. The maximum heat input rate of biogas burned in the flare shall not exceed 21.35 million Btu per hour (MMBtu/hr).
- b. The total heat input to the biogas flare shall not exceed 187,026 MMBtu/12 consecutive month period.

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; and, 0810007-013-AC]

**B.2. Methods of Operation - (i.e., Fuels)** The only fuels authorized to be burned in the flare are biogas generated in the anaerobic reactor, and natural gas or propane used to fire the pilot burner. Biogas generated as a byproduct of the anaerobic reactor shall be burned as a fuel for the hot water boiler, with the biogas flare used to incinerate excess biogas in the event of a system malfunction or during periods of excess biogas production. [Rules 62-4.160(2) and 62-213.440(1), F.A.C.]

**Emission Limitations and Standards**

**B.3. Visible emissions from the biogas flare shall not be equal to or exceed 20% opacity.** [AC41-204587; and, Rule 62-296.320(4)(b), F.A.C.]

**B.4. Overall SO<sub>2</sub> Emission Limit Cap** - Total sulfur dioxide (SO<sub>2</sub>) emissions from the Anaerobic Reactor w/Biogas Flare and the Cleaver Brooks Steam Boiler resulting from the combustion of biogas shall not exceed either of the following:

## AIR CONSTRUCTION PERMIT

### SECTION III. EMISSIONS UNITS SPECIFIC CONDITIONS

---

- a. 6.9 pounds per hour on a calendar monthly average basis;
  - b. 30.22 tons in any consecutive 12 month period.
- [Rule 62-212.400(1)(c), F.A.C.; and, 0810007-013-AC]

#### **Test Methods and Procedures**

**B.5.** Test the visible emissions (VE) from the anaerobic reactor biogas flare annually on or during the 60 day period prior to March 18 (See Condition B.6.). [Rule 62-297.310(7)(a)(4), F.A.C.]

**B.6.** Compliance with the emission limitation of Condition B.3 shall be determined using DEP Method 9 contained in Chapter 62-297, F.A.C. The test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur. The minimum requirements for stack sampling facilities, source sampling and reporting, shall be in accordance with Chapter 62-297, F.A.C. and 40 CFR 60, Appendix A. [Chapter 62-297, F.A.C.]

**B.7.** The sulfur content of the biogas shall be determined in accordance with Tropicana's Environmental Laboratory's Procedure "H<sub>2</sub>S Determination Using Sulfur Chemiluminescence Detector", Reference ASTM Method D 5504-94. [AC41-204587 as amended March 27, 1996; and, Rule 62-4.070(3), F.A.C.]

#### **Recordkeeping and Reporting Requirements**

**B.8. Additional Recordkeeping Requirements** - To demonstrate compliance with the overall biogas combustion sulfur dioxide (SO<sub>2</sub>) emission limits in this permit, the permittee shall maintain a monthly Biogas SO<sub>2</sub> Emissions Log which shall:

- a. Record daily biogas production (ft<sup>3</sup> biogas/day), and weekly H<sub>2</sub>S concentration (H<sub>2</sub>S ppmv) results. (Note: Biogas flow measured at 70°F.)
- b. Calculate total sulfur dioxide emissions resulting from the combustion of biogas in units of pounds per hour on a monthly average basis using the formula shown below. (Note: H<sub>2</sub>S density at 70°F: 0.0892 lb/ft<sup>3</sup>.)
- c. Calculate total sulfur dioxide (SO<sub>2</sub>) emissions resulting from the combustion of biogas in units of tons per month using the formula shown below.
- d. Calculate total sulfur dioxide (SO<sub>2</sub>) emissions (tons/year) for the most recent 12 consecutive month period.

The permittee shall complete the calculations in b. through d. by the 15th of the following month. These records shall be recorded in a permanent form suitable for inspection by the Department upon request and shall be retained for at least a five (5) year period.

#### **Formulas:**

$$\text{MO. AVG. H}_2\text{S ft}^3/\text{ft}^3 \text{ biogas} = (\text{MO. AVG. H}_2\text{S ppmv}) \times 10^{-6}$$

$$\text{Biogas SO}_2 \text{ emissions (lb/hr)} = (\text{MO. AVG. ft}^3 \text{ biogas/day}) \times (1 \text{ day/24 hr}) \times (0.0892 \text{ lb H}_2\text{S/ft}^3 \text{ H}_2\text{S}) \times (\text{MO. AVG. H}_2\text{S ft}^3/\text{ft}^3 \text{ biogas}) \times (64 \text{ lb SO}_2/34 \text{ lb H}_2\text{S})$$

## AIR CONSTRUCTION PERMIT

### SECTION III. EMISSIONS UNITS SPECIFIC CONDITIONS

---

Biogas SO<sub>2</sub> emissions (tons/month) = (Total ft<sup>3</sup> biogas/month) x (0.0892 lb H<sub>2</sub>S/ft<sup>3</sup> H<sub>2</sub>S) x (MO. AVG. H<sub>2</sub>S ft<sup>3</sup>/ft<sup>3</sup> biogas) x (64 lb SO<sub>2</sub>/34 lb H<sub>2</sub>S) x (1 ton SO<sub>2</sub>/2000 lb SO<sub>2</sub>)  
[Rule 62-213.440, F.A.C.; and, 0810007-006-AC]

**B.9.** In order to document compliance with Condition G.1, the permittee shall maintain a record of the hours of operation of the biogas flare. This log shall show the

- a. date, start and end time for flare operation;
- b. the reason for use of the flare (i.e. malfunction, excess biogas, etc.);
- c. the estimated maximum flare biogas heat input rate (MMBtu/hour) during the period of use.

These records shall be recorded in a permanent form suitable for inspection by the Department upon request. [Rule 62-213.440, F.A.C.; and, AC41-204587]

**SENDER: COMPLETE THIS SECTION**

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

## 1. Article Addressed to:

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

## 2. Article Number

(Transfer from service label) 7000 2870 0000 7028 0856

PS Form 3811, August 2001

Domestic Return Receipt

102595-02-M-1540

**COMPLETE THIS SECTION ON DELIVERY**

## A. Signature

X

*Earl F. Allright*

☒ Agent☒ Addressee

## B. Received by (Printed Name)

*Earl F. Allright*

## C. Date of Delivery

APR - 9 2003

D. Is delivery address different from item 1? ☐ Yes

If YES, enter delivery address below:

☐ No

## 3. Service Type

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

## 4. Restricted Delivery? (Extra Fee)

☐ Yes

## U.S. Postal Service

**CERTIFIED MAIL RECEIPT**

(Domestic Mail Only; No Insurance Coverage Provided)

Mr. Michael Haycock

Postage

\$

Certified Fee

Return Receipt Fee  
(Endorsement Required)Restricted Delivery Fee  
(Endorsement Required)

Total Postage &amp; Fees

\$

Postmark  
Here

## Sent To

Mr. Michael Haycock, Vice President

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

P.O. Box 338

City, State, ZIP+4

Bradenton, Florida 34206

PS Form 3800, May 2000

See Reverse for Instructions



## Memorandum

## Florida Department of Environmental Protection

TO: Trina Vielhauer  
THRU: Scott Sheplak *SS*  
FROM: Ed Svec *ES*  
DATE: March 31, 2003  
SUBJECT: Tropicana Products, Inc.  
Biogas Combustion

Attached for approval and signature is an intent to issue a construction permit to allow Tropicana Products, Inc. to burn all of the biogas produced in a 12 consecutive month period in the Biogas Flare at the anaerobic reactor (Emissions Unit I.D. No. -022). The emissions cap associated with the combustion of the biogas will be accounted for at the flare and boiler, only.

This project is not subject to PSD because the associated emissions increases are not significant for PSD. Total emissions increase in sulfur dioxide will not exceed 26.52 tons per year, if all of the biogas was combusted in the flare.

I recommend your approval and signature.

March 31, 2003 is day 45 of the 90 day timeclock.

### Attachments

/es

- ① why new limits on gas turbine
- ② SO<sub>2</sub> only calculated on flare & boiler bc. deleting Glass Mills?  
→ any need to require 2nd glass plant to retire? ~~I keep cap until it does?~~  
did it retire? Is it removed from TV permit?
- ③ ~~cap~~ SO<sub>2</sub> cap on flare & boiler is for biogas combustion only so  
how know if complying? Do method 90 when only using biogas?

**RECEIVED**

**FEB 13 2003**

**BUREAU OF AIR REGULATION**

**APPLICATION FOR  
MINOR SOURCE AIR CONSTRUCTION PERMIT  
FOR TROPICANA PRODUCTS, INC.  
BRADENTON CITRUS PROCESSING FACILITY  
ANAEROBIC REACTOR WITH BIOGAS FLARE**

**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**

**January 2003  
0237606**

**DISTRIBUTION:**

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

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

##### Application Contact

1. Name and Title of Application Contact: <b>Douglas E. Foster, Director, Corporate Environmental &amp; Safety</b>	
2. Application Contact Mailing Address: Organization/Firm: <b>Tropicana Products, Inc.</b> Street Address: <b>P.O. Box 338</b> City: <b>Bradenton</b> State: <b>FL</b> Zip Code: <b>34206</b>	
3. Application Contact Telephone Numbers: Telephone: <b>( 941 ) 742 - 2748</b> Fax: <b>( 941 ) 742 - 3768</b>	

##### Application Processing Information (DEP Use)

1. Date of Receipt of Application:	
2. Permit Number:	
3. PSD Number (if applicable):	
4. Siting Number (if applicable):	

## **Purpose of Application**

### **Air Operation Permit Application**

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

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

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

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

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

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

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

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

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

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

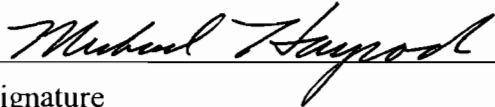
Reason for revision: \_\_\_\_\_

### **Air Construction Permit Application**

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

- ☒ 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: <b>Michael Haycock, Vice President, Manufacturing</b>
2. Owner/Authorized Representative or Responsible Official Mailing Address: Organization/Firm: <b>Tropicana Products, Inc.</b> Street Address: <b>P.O. Box 338</b> City: <b>Bradenton</b> State: <b>FL</b> Zip Code: <b>34206</b>
3. Owner/Authorized Representative or Responsible Official Telephone Numbers: Telephone: <b>( 941 ) 742-3349</b> Fax: <b>( 941 ) 749-2049</b>
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>  <div style="display: flex; justify-content: space-between;"><div style="text-align: center;"> Signature</div><div style="text-align: center;"><u>02/07/03</u> Date</div></div>

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

**Professional Engineer Certification**

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

\* 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

2/6/03  
Date

(seal)

Attach any exception to certification statement.

**Scope of Application**

<b>Emissions Unit ID</b>	<b>Description of Emissions Unit</b>	<b>Permit Type</b>	<b>Processing Fee</b>
<b>022</b>	<b>Anaerobic Reactor with Biogas Flare</b>	<b>AC1D</b>	<b>NA</b>

**Application Processing Fee**

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



**Construction/Modification Information**

1. Description of Proposed Project or Alterations:

**This permit application is being submitted to remove the fuel use restriction for the biogas flare (see Part II).**

2. Projected or Actual Date of Commencement of Construction: **NA**

3. Projected Date of Completion of Construction: **NA**

**Application Comment**

**Emission Units 012 and 014, Glass Plants Nos. 2 and 3, were authorized to burn biogas. These emission units will no longer be operated resulting in the need to increase the amount of biogas burned in the flare (see Part II).**

## II. FACILITY INFORMATION

### A. GENERAL FACILITY INFORMATION

#### Facility Location and Type

1. Facility UTM Coordinates: Zone: <b>17</b> East (km): <b>561.4</b> North (km): <b>3056.5</b>			
2. Facility Latitude/Longitude: Latitude (DD/MM/SS): <b>27 / 37 / 52</b> Longitude (DD/MM/SS): <b>80 / 22 / 33</b>			
3. Governmental Facility Code: <b>0</b>	4. Facility Status Code: <b>A</b>	5. Facility Major Group SIC Code: <b>20</b>	6. Facility SIC(s): <b>2037, 2653, 3221</b>
7. Facility Comment (limit to 500 characters):  <b>See Attachment Part II.</b>			

#### Facility Contact

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

### 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):  <b>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.</b>	

### List of Applicable Regulations

All federal regulatory citations reflect the rule language as of October 2002. All state regulatory citations reflect rule language as of October 2002. Only those rules and regulations specifically identified herein apply to this facility. See Title V Core List (Attachment TB-FI-A), effective 3/1/02.	

## 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

**ATTACHMENT TB-FI-A**

**CORE LIST**

# Title V Core List

Effective: 03/01/02

[**Note:** The Title V Core List is meant to simplify the completion of the "List of Applicable Regulations" for DEP Form No. 62-210.900(1), Application for Air Permit - Long Form. The Title V Core List is a list of rules to which all Title V Sources are presumptively subject. The Title V Core List may be referenced in its entirety, or with specific exceptions. The Department may periodically update the Title V Core List.]

## **Federal:** (description)

40 CFR 61, Subpart M: NESHAP for Asbestos.

40 CFR 82: Protection of Stratospheric Ozone.

40 CFR 82, Subpart B: Servicing of Motor Vehicle Air Conditioners (MVAC).

40 CFR 82, Subpart F: Recycling and Emissions Reduction.

## **State:** (description)

### **CHAPTER 62-4, F.A.C.: PERMITS, effective 06-01-01**

62-4.030, F.A.C.: General Prohibition.

62-4.040, F.A.C.: Exemptions.

62-4.050, F.A.C.: Procedure to Obtain Permits; Application

62-4.060, F.A.C.: Consultation.

62-4.070, F.A.C.: Standards for Issuing or Denying Permits; Issuance; Denial.

62-4.080, F.A.C.: Modification of Permit Conditions.

62-4.090, F.A.C.: Renewals.

62-4.100, F.A.C.: Suspension and Revocation.

62-4.110, F.A.C.: Financial Responsibility.

62-4.120, F.A.C.: Transfer of Permits.

62-4.130, F.A.C.: Plant Operation - Problems.

62-4.150, F.A.C.: Review

62-4.160, F.A.C.: Permit Conditions.

62-4.210, F.A.C.: Construction Permits.

62-4.220, F.A.C.: Operation Permit for New Sources.

### **CHAPTER 62-210, F.A.C.: STATIONARY SOURCES - GENERAL REQUIREMENTS, effective 06-21-01**

62-210.300, F.A.C.: Permits Required.

62-210.300(1), F.A.C.: Air Construction Permits.

62-210.300(2), F.A.C.: Air Operation Permits.

62-210.300(3), F.A.C.: Exemptions.

62-210.300(5), F.A.C.: Notification of Startup.

62-210.300(6), F.A.C.: Emissions Unit Reclassification.

62-210.300(7), F.A.C.: Transfer of Air Permits.



## **Title V Core List**

Effective: 03/01/02

62-210.350, F.A.C.: Public Notice and Comment.  
62-210.350(1), F.A.C.: Public Notice of Proposed Agency Action.  
62-210.350(2), F.A.C.: Additional Public Notice Requirements for Emissions Units Subject to Prevention of Significant Deterioration or Nonattainment-Area Preconstruction Review.  
62-210.350(3), F.A.C.: Additional Public Notice Requirements for Sources Subject to Operation Permits for Title V Sources.

62-210.360, F.A.C.: Administrative Permit Corrections.  
62-210.370(3), F.A.C.: Annual Operating Report for Air Pollutant Emitting Facility.  
62-210.400, F.A.C.: Emission Estimates.  
62-210.650, F.A.C.: Circumvention.  
62-210.700, F.A.C.: Excess Emissions

62-210.900, F.A.C.: Forms and Instructions.  
62-210.900(1), F.A.C.: Application for Air Permit - Title V Source, Form and Instructions.  
62-210.900(5), F.A.C.: Annual Operating Report for Air Pollutant Emitting Facility, Form and Instructions.  
62-210.900(7), F.A.C.: Application for Transfer of Air Permit - Title V and Non-Title V Source.

**CHAPTER 62-212, F.A.C.: STATIONARY SOURCES- PRECONSTRUCTION REVIEW,**  
effective 08-17-00

**CHAPTER 62-213, F.A.C.: OPERATION PERMITS FOR MAJOR SOURCES OF AIR POLLUTION,**  
effective 04-16-01

62-213.205, F.A.C.: Annual Emissions Fee.  
62-213.400, F.A.C.: Permits and Permit Revisions Required.  
62-213.410, F.A.C.: Changes Without Permit Revision.  
62-213.412, F.A.C.: Immediate Implementation Pending Revision Process.  
62-213.415, F.A.C.: Trading of Emissions Within a Source.  
62-213.420, F.A.C.: Permit Applications.  
62-213.430, F.A.C.: Permit Issuance, Renewal, and Revision.  
62-213.440, F.A.C.: Permit Content.  
62-213.450, F.A.C.: Permit Review by EPA and Affected States  
62-213.460, F.A.C.: Permit Shield.

62-213.900, F.A.C.: Forms and Instructions.  
62-213.900(1), F.A.C.: Major Air Pollution Source Annual Emissions Fee Form.  
62-213.900(7), F.A.C.: Statement of Compliance Form

## **Title V Core List**

Effective: 03/01/02

### **CHAPTER 62-296, F.A.C.: STATIONARY SOURCES - EMISSION STANDARDS, effective 03-02-99**

62-296.320(2), F.A.C.: Objectionable Odor Prohibited.

62-296.320(4)(c), F.A.C.: Unconfined Emissions of Particulate Matter

### **CHAPTER 62-297, F.A.C.: STATIONARY SOURCES - EMISSIONS MONITORING, effective 03-02-99**

62-297.310, F.A.C.: General Test Requirements.

62-297.330, F.A.C.: Applicable Test Procedures.

62-297.340, F.A.C.: Frequency of Compliance Tests.

62-297.345, F.A.C.: Stack Sampling Facilities Provided by the Owner of an Emissions Unit.

62-297.350, F.A.C.: Determination of Process Variables.

62-297.570, F.A.C.: Test Report.

62-297.620, F.A.C.: Exceptions and Approval of Alternate Procedures and Requirements.

#### **Miscellaneous:**

**CHAPTER 28-106, F.A.C.: Decisions Determining Substantial Interests**

**CHAPTER 62-110, F.A.C.: Exception to the Uniform Rules of Procedure, effective 07-01-98**

**CHAPTER 62-256, F.A.C.: Open Burning and Frost Protection Fires, effective 11-30-94**

**CHAPTER 62-257, F.A.C.: Asbestos Notification and Fee, effective 02-09-99**

**CHAPTER 62-281, F.A.C.: Motor Vehicle Air Conditioning Refrigerant Recovery and  
Recycling, effective 09-10-96**

**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):			
<b>Anaerobic Reactor with Biogas Flare</b>			
4. Emissions Unit Identification Number:		<input type="checkbox"/> No ID <input type="checkbox"/> ID Unknown	
ID: <b>022</b>			
5. Emissions Unit Status Code:	6. Initial Startup Date:	7. Emissions Unit Major Group SIC Code:	8. Acid Rain Unit?
<b>A</b>		<b>20</b>	<input type="checkbox"/>
9. Emissions Unit Comment: (Limit to 500 Characters)			
<b>Emission unit consists of a Bacardi anaerobic reactor and a John Zink flare. The anaerobic reactor is part of the wastewater treatment system (see Part II).</b>			

**Emissions Unit Control Equipment**

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

**Flare**

2. Control Device or Method Code(s): **023**

**Emissions Unit Details**

1. Package Unit:

Manufacturer: **John Zink Enclosed Flare System** Model Number:

2. Generator Nameplate Rating: **MW**

3. Incinerator Information:

Dwell Temperature: °F

Dwell Time: seconds

Incinerator Afterburner Temperature: °F

**B. EMISSIONS UNIT CAPACITY INFORMATION**  
**(Regulated Emissions Units Only)****Emissions Unit Operating Capacity and Schedule**

1. Maximum Heat Input Rate:	21.35	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):		
See Part II.		

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

**List of Applicable Regulations**

See Attachment TB-EU1-C for operational requirements.	

**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? <b>NA</b>		2. Emission Point Type Code: <b>1</b>	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point):  <b>Exhausts through a single stack.</b>			
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common:			
5. Discharge Type Code: <b>V</b>	6. Stack Height: <b>35</b> feet	7. Exit Diameter: <b>1.7</b> feet	
8. Exit Temperature: <b>300</b> °F	9. Actual Volumetric Flow Rate: <b>2,300</b> acfm	10. Water Vapor: <b>%</b>	
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):			

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

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

1. Segment Description (Process/Fuel Type) (limit to 500 characters):  <b>Food and Agriculture – Fuel Fired Equipment – Natural Gas</b>		
2. Source Classification Code (SCC): <b>3-02-900-03</b>		3. SCC Units: <b>Million Cubic Feet Burned</b>
4. Maximum Hourly Rate: <b>0.022</b>	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit: <b>950</b>
10. Segment Comment (limit to 200 characters):  <b>Natural gas used in flare pilot burner system for startup and stabilization.</b>		

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

1. Segment Description (Process/Fuel Type ) (limit to 500 characters):  <b>Food and Agriculture – Fuel Fired Equipment</b>		
2. Source Classification Code (SCC): <b>3-02-910</b>		3. SCC Units: <b>Million Btu</b>
4. Maximum Hourly Rate: <b>21.35</b>	5. Maximum Annual Rate: <b>187,026</b>	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur: <b>Variable</b>	8. Maximum % Ash:	9. Million Btu per SCC Unit: <b>Variable</b>
10. Segment Comment (limit to 200 characters):  <b>Heat and sulfur contents are variable depending upon anaerobic process conditions.</b>		



**F. EMISSIONS UNIT POLLUTANTS**  
(All Emissions Units)

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
SO <sub>2</sub>			EL

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

**Potential/Fugitive Emissions**

1. Pollutant Emitted: <b>SO<sub>2</sub></b>		2. Total Percent Efficiency of Control:	
3. Potential Emissions: lb/hour <b>30.22</b> tons/year		4. Synthetically Limited? <input checked="" type="checkbox"/> [ X ]	
5. Range of Estimated Fugitive Emissions: [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year			
6. Emission Factor: Reference: <b>AC41-204587 and 0810007-003-AV</b>		7. Emissions Method Code: <b>0</b>	
8. Calculation of Emissions (limit to 600 characters):  <b>See Part II.</b>			
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):  <b>TPY based on the maximum allowable in air construction and Title V permits.</b>			

**Allowable Emissions** Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: <b>Other</b>		2. Future Effective Date of Allowable Emissions:	
3. Requested Allowable Emissions and Units: <b>30.22 ton/yr</b>		4. Equivalent Allowable Emissions: lb/hour <b>30.22</b> tons/year	
5. Method of Compliance (limit to 60 characters):  <b>Fuel Sampling</b>			
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):  <b>Air Construction Permit AC 41-204587 and Title V permit (0810007-0030AV) (see Part II).</b>			

**H. VISIBLE EMISSIONS INFORMATION**  
(Only Regulated Emissions Units Subject to a VE Limitation)**Visible Emissions Limitation:** Visible Emissions Limitation 1 of 2

1. Visible Emissions Subtype: <b>VE20</b>	2. Basis for Allowable Opacity: <input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other
3. Requested Allowable Opacity: Normal Conditions: <b>20 %</b> Exceptional Conditions: <b>27 %</b> Maximum Period of Excess Opacity Allowed: <b>6 min/hour</b>	
4. Method of Compliance: <b>EPA Method 9</b>	
5. Visible Emissions Comment (limit to 200 characters):  <b>Rule 62-296.320(4)(b), F.A.C. Excess opacity allowed by Rule 62-210.700 for startup, shutdown, and malfunctions and limited to 2 hours in 24 hours.</b>	

**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 [ ] Attached, Document ID: _____ [ X ] Not Applicable [ ] Waiver Requested
4. Description of Stack Sampling Facilities [ ] Attached, Document ID: _____ [ X ] Not Applicable [ ] Waiver Requested
5. Compliance Test Report [ ] Attached, Document ID: _____ [ ] Previously submitted, Date: _____ [ X ] Not Applicable
6. Procedures for Startup and Shutdown [ ] Attached, Document ID: _____ [ X ] Not Applicable [ ] Waiver Requested
7. Operation and Maintenance Plan [ ] Attached, Document ID: _____ [ X ] Not Applicable [ ] Waiver Requested
8. Supplemental Information for Construction Permit Application [ X ] Attached, Document ID: <u>Part II</u> [ ] Not Applicable
9. Other Information Required by Rule or Statute [ ] Attached, Document ID: _____ [ X ] Not Applicable
10. Supplemental Requirements Comment:          

**Additional Supplemental Requirements for Title V Air Operation Permit Applications**

11. Alternative Methods of Operation

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

12. Alternative Modes of Operation (Emissions Trading)

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

13. Identification of Additional Applicable Requirements

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

14. Compliance Assurance Monitoring Plan

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

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

☐ Acid Rain Part - Phase II (Form No. 62-210.900(1)(a))  
Attached, Document ID: \_\_\_\_\_

☐ Repowering Extension Plan (Form No. 62-210.900(1)(a)1.)  
Attached, Document ID: \_\_\_\_\_

☐ New Unit Exemption (Form No. 62-210.900(1)(a)2.)  
Attached, Document ID: \_\_\_\_\_

☐ Retired Unit Exemption (Form No. 62-210.900(1)(a)3.)  
Attached, Document ID: \_\_\_\_\_

☐ Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.)  
Attached, Document ID: \_\_\_\_\_

☐ Phase NOx Averaging Plan (Form No. 62-210.900(1)(a)5.)  
Attached, Document ID: \_\_\_\_\_

☒ Not Applicable

**ATTACHMENT TB-EU1-C**  
**LIST OF APPLICABLE REGULATIONS**

**ATTACHMENT TB-EU1-C****LIST OF APPLICABLE REGULATIONS**

EMISSION UNIT ID: Anerobic Process Flare

**FDEP Rules:**

**Stationary Sources-General:**

- 62-210.700(1) - Excess Emissions; Malfunction;2hrs/24hrs
- 62-210.700(4) - Excess Emissions; poor maintenance exclusion
- 62-210.700(6) - Excess Emissions; reporting

**Stationary Sources-Emission Standards:**

- 62-296.320(4)(b) - General VE (by air construction permit)

**Stationary Sources-Emission Monitoring:**

- 62-297.310(2)(b) - Operating Rate
- 62-297.310(4)(a)2. - Applicable Test Procedures; VE
- 62-297.310(5) - Determination of Process Variables
- 62-297.310(7)(a)1. - Renewal
- 62-297.310(7)(a)3. - Permit Renewal Test Required
- 62-297.310(7)(a)4.a. - Annual Test (visible emissions)
- 62-297.310(7)(a)9. - FDEP Notification - 15 days
- 62-297.310(8) - Test Reports

**PART II**  
**SUPPORTING INFORMATION**



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LIST OF ATTACHMENT

ATTACHMENT A	ANAEROBIC REACTOR WITH BIOGAS FLARE CLEAVER BROOKS STEAM BOILER TITLE V PERMIT 0810007-003-AV SUBSECTIONS G AND F
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## 1.0 INTRODUCTION

Tropicana Products, Inc. (Tropicana) is submitting this minor source air construction application for the existing Bradenton Citrus Processing Plant to revise an existing Title V Permit (080007-003-AV) for the anaerobic reactor and biogas flare to eliminate the total heat input restriction of 18,659 MMBtu per 12 consecutive month period. Since this provision was included as part of a minor source construction permit, this minor source air construction permit is being submitted to change the condition underlying the condition in the Title V permit (Condition G.1). There is no request to change the emission restriction on sulfur dioxide emissions from the anaerobic reactor, but to clarify the emission units that will use biogas.

Presented below are descriptions of the existing facility and a discussion of request.

### 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 distributing. 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, a sanitary process steam boiler (used to produce 5-fold citrus oil) and a standby process steam boiler], 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 the Florida Department of Environmental Protection (FDEP) on February 27, 2000 (Final Permit No. 0810007-003-AV).

### 1.2 ANAEROBIC REACTOR WITH BIOGAS FLARE

The Tropicana Bradenton facility has an anaerobic reactor and biogas flare identified as Emission Unit 022 in the Title V Permit. The anaerobic reactor is part of the wastewater treatment system and produces a biogas. The biogas is currently authorized to be burned in the No. 2 and No. 3 Glass Plants, a biogas flare and/or small steam boiler. The glass plants are being phased out due to

consumer demand (consumers prefer plastic or cardboard containers). The No. 2 Glass Plant stopped operating in 2000, while No. 3 Glass Plant will stop operating this winter. With the closing of the glass plants, the biogas can only be burned in the biogas flare and small boiler. The current Title V Permit for the Tropicana facility has a restriction in the amount of total heat input for the biogas flare of 18,659 MMBtu/12 consecutive months. At the maximum heat input of 21.35 MMBtu/hr, operation would be limited to 874 hours. The restriction was an artifact of trying not to double count emissions in the three sources during the original permitting, since all emission units would burn biogas at one time or another. There is an overall emission limit on sulfur dioxide (SO<sub>2</sub>) emissions as a cap on the glass plants, biogas flare and boiler of 6.9 lb/hr and 30.22 tons/year. This emission limit was based on a maximum hourly heat input of 21.35 MMBtu/hr for the anaerobic process. However, there is no individual sulfur dioxide emission limit imposed on the glass plants, biogas flare or boiler, since all units could have the capability of burning biogas. Given that the glass plants will no longer be operating, the restriction on total heat input is requested to be changed from the 18,659 MMBtu per 12 consecutive months in Title V and Air Construction Permit to 187,026 MMBtu per 12 consecutive months. The latter represents potential heat input at 8,760 hours at 21.35 MMBtu/hr.

The maximum sulfur dioxide emissions were developed from the hourly biogas production and sulfur content in the biogas. The hourly biogas generation of 24,150 cubic feet (cf)/hr which is equivalent to 21.35 MMBtu at a heat content of biogas of 884.2 Btu/cf. The sulfur dioxide emissions were based on 1 grain sulfur per cubic foot ( $24,150 \text{ cf/hr} \times 1 \text{ grain S/cf} \times \text{lb}/7,000 \text{ grains} \times 2 \text{ lb SO}_2/\text{lb S} = 6.9 \text{ lb/hr}$ ). The hourly emissions of 6.9 lb/hr assumed 8,760 hours per year operation for the 30.22 tons/year limit in the permits. It should be noted that the amount, heat content and sulfur content of the biogas generated are dependent upon the process conditions and wastewater. The annual emission limit was designed to envelop the total amount of emission expected from the operation of the anaerobic reactor. The actual SO<sub>2</sub> emissions reported in the annual operating reports for the years 2000 and 2001 were 4.3 and 3.1 tons/year respectively. The emissions reductions associated with the closing of the glass plants will be approximately 500 tons/year for SO<sub>2</sub> and 300 tons/year of NO<sub>x</sub>. These reductions are from the latest 2 years of operation (1999 and 2000 for Glass Plant No. 2, and 2000 and 2001 for Glass Plant No. 3).

### **1.3 REQUESTED CHANGES**

A copy of the applicable portions of the Title V permit is contained in Attachment A. Changes in three conditions of the Title V permit are requested. The first deals with the capacity of the biogas flare while the second and third changes deal with the overall SO<sub>2</sub> emission limit cap established for

the biogas flare (Emission Unit 022) and the Cleaver Brooks steam boiler (Emission Unit No. 021). The requested changes are summarized below:

**Change Condition G.1. from:**

Capacity.

- a. The maximum heat input rate of bio-gas burned in the flare shall not exceed 21.35 million Btus per hour (MMBtu/hr).
- b. The total heat input to the bio-gas flare shall not exceed 18,659 MMBtu/12 consecutive month period.

**Change Condition G.1. to:**

Capacity.

- a. The maximum heat input rate of bio-gas burned in the flare shall not exceed 21.35 million Btus per hour (MMBtu/hr).
- b. The total heat input to the bio-gas flare shall not exceed 187,026 MMBtu/12 consecutive month period.

**Change Conditions G.4. and F.4. from:**

Overall SO<sub>2</sub> Emission Limit Cap – Total SO<sub>2</sub> emissions from the Glass Plant No. 2 furnace, the Glass Plant No. 3 furnace, the Anaerobic Reactor w/Bio-gas Flare, and the Cleaver Brooks Steam Boiler resulting from the combustion of biogas shall not exceed either of the following:

- a. 6.9 pounds per hour on a calendar monthly average basis;
- b. 30.22 tons in any consecutive 12 month period.

**Change Conditions G.4. and F.4. to:**

Overall SO<sub>2</sub> Emission Limit Cap – Total SO<sub>2</sub> emissions from the Anaerobic Reactor w/Bio-gas Flare, and the Cleaver Brooks Steam Boiler resulting from the combustion of biogas shall not exceed either of the following:

- a. 6.9 pounds per hour on a calendar monthly average basis;
- b. 30.22 tons in any consecutive 12 month period.

**ATTACHMENT A**

**ANAEROBIC REACTOR WITH BIOGAS FLARE**

**CLEAVER BROOKS STEAM BOILER**

**TITLE V PERMIT 0810007-003-AV SUBSECTIONS G AND F**

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

**E.U.**

**ID No.      Brief Description**

-022      Anaerobic Reactor with Biogas Flare

The Bacardi anaerobic reactor is part of the waste water treatment system. As wastewater is treated in the reactor methane rich bio-gas is generated. The bio-gas is compressed and a portion is used to fuel a steam boiler. The remainder blends into the natural gas header for glass furnace Nos. 2 and 3 and is used as a supplemental fuel. Any excess bio-gas is incinerated in a flare (see below).

Air pollutants contained in the bio-gas, methane (VOC) and H<sub>2</sub>S, are controlled by a John Zink Bio-Gas Flare system. This system is used as a flare to burn bio-gas in the event of a system upset (malfunction) and during periods of excess bio-gas production. The flare system is equipped with a pilot burner for system startup and flame stabilization. This pilot burner is fired with natural gas or propane. Sulfur dioxide emissions are controlled by limiting the sulfur content of the bio-gas.

{Permitting note(s): This emission unit is regulated under Rule 62-212.400, F.A.C., Prevention of Significant Deterioration; and Rule 62-296.320, F.A.C., General Pollutant Emission Limiting Standards.}

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

**Essential Potential to Emit (PTE) Parameters**

**G.1. Capacity.**

- a. The maximum heat input rate of bio-gas burned in the flare shall not exceed 21.35 million Btu per hour (MMBtu/hr).
- b. The total heat input to the bio-gas flare shall not exceed 18,659 MMBtu/12 consecutive month period.

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; Air Construction Permit AC41-204587]

**G.2. Methods of Operation - (i.e., Fuels)** The only fuels authorized to be burned in the flare are bio-gas generated in the anaerobic reactor, and natural gas or propane used to fire the pilot burner. Bio-gas generated as a byproduct of the anaerobic reactor shall be burned as a fuel for the hot water boiler and as a supplemental fuel in Glass Plant Nos. 2 and 3, with the bio-gas flare used to incinerate excess bio-gas in the event of a system malfunction or during periods of excess bio-gas production.

[Rules 62-4.160(2) and 62-213.440(1), F.A.C.; Air Construction Permit AC41-204587]

**Emission Limitations and Standards**

**G.3.** Visible emissions from the bio-gas flare shall not exceed 20% opacity.  
[Air Construction Permit AC41-204587; Rule 62-296.320(4)(b), F.A.C.]

**G.4. Overall SO<sub>2</sub> Emission Limit Cap** - Total sulfur dioxide (SO<sub>2</sub>) emissions from the Glass Plant No. 2 furnace, the Glass Plant No. 3 Furnace, the Anaerobic Reactor w/Biogas Flare, and the Cleaver Brooks Steam Boiler resulting from the combustion of biogas shall not exceed either of the following:

- a. 6.9 pounds per hour on a calendar monthly average basis;
- b. 30.22 tons in any consecutive 12 month period.

[Rule 62-212.400(1)(c), F.A.C.; Air Construction Permit 0810007-006-AC]

**Test Methods and Procedures**

**G.5.** Test the visible emissions (VE) from the anaerobic reactor bio-gas flare annually on or during the 60 day period prior to March 18 (See Condition G.6.).  
[Rule 62-297.310(7)(a)(4), F.A.C.]

**G.6.** Compliance with the emission limitation of Condition G.3 shall be determined using DEP Method 9 contained in Chapter 62-297, F.A.C. The test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur. The minimum requirements for stack sampling facilities, source sampling and reporting, shall be in accordance with Chapter 62-297, F.A.C. and 40 CFR 60, Appendix A.

[Chapter 62-297, F.A.C.]

**G.7.** The sulfur content of the bio-gas shall be determined in accordance with Tropicana's Environmental Laboratory's Procedure "H<sub>2</sub>S Determination Using Sulfur Chemiluminescence Detector", Reference ASTM Method D 5504-94.

[Air Construction Permit AC41-204587 as amended March 27, 1996; Rule 62-4.070(3), F.A.C.]

**Recordkeeping and Reporting Requirements**

**G.8. Additional Recordkeeping Requirements** - To demonstrate compliance with the overall biogas combustion sulfur dioxide (SO<sub>2</sub>) emission limits in this permit, the permittee shall maintain a monthly Biogas SO<sub>2</sub> Emissions Log which shall:

- a. Record daily biogas production (ft<sup>3</sup> biogas/day), and weekly H<sub>2</sub>S concentration (H<sub>2</sub>S ppmv) results. (Note: Biogas flow measured at 70°F.)
- b. Calculate total sulfur dioxide emissions resulting from the combustion of biogas in units of pounds per hour on a monthly average basis using the formula shown below. (Note: H<sub>2</sub>S density at 70°F: 0.0892 lb/ft<sup>3</sup>.)

- c. Calculate total sulfur dioxide (SO<sub>2</sub>) emissions resulting from the combustion of biogas in units of tons per month using the formula shown below.
- d. Calculate total sulfur dioxide (SO<sub>2</sub>) emissions (tons/year) for the most recent 12 consecutive month period.

The permittee shall complete the calculations in b. through d. by the 15th of the following month. These records shall be recorded in a permanent form suitable for inspection by the Department upon request and shall be retained for at least a five (5) year period.

Formulas:

$$\text{MO. AVG. H}_2\text{S ft}^3/\text{ft}^3 \text{ biogas} = (\text{MO. AVG. H}_2\text{S ppmv}) \times 10^{-6}$$

$$\text{Biogas SO}_2 \text{ emissions (lb/hr)} = (\text{MO. AVG. ft}^3 \text{ biogas/day}) \times (1 \text{ day/24 hr}) \times (0.0892 \text{ lb H}_2\text{S/ft}^3 \text{ H}_2\text{S}) \times (\text{MO. AVG. H}_2\text{S ft}^3/\text{ft}^3 \text{ biogas}) \times (64 \text{ lb SO}_2/34 \text{ lb H}_2\text{S})$$

$$\text{Biogas SO}_2 \text{ emissions (tons/month)} = (\text{Total ft}^3 \text{ biogas/month}) \times (0.0892 \text{ lb H}_2\text{S/ft}^3 \text{ H}_2\text{S}) \times (\text{MO. AVG. H}_2\text{S ft}^3/\text{ft}^3 \text{ biogas}) \times (64 \text{ lb SO}_2/34 \text{ lb H}_2\text{S}) \times (1 \text{ ton SO}_2/2000 \text{ lb SO}_2)$$

[Rule 62-213.440, F.A.C.; Air Construction Permit 0810007-006-AC]

**G.9.** In order to document compliance with Condition G.1, the permittee shall maintain a record of the hours of operation of the bio-gas flare. This log shall show the

- a. date, start and end time for flare operation;
- b. the reason for use of the flare (i.e. malfunction, excess bio-gas, etc.);
- c. the estimated maximum flare bio-gas heat input rate (MMBtu/hour) during the period of use.

These records shall be recorded in a permanent form suitable for inspection by the Department upon request.

[Rule 62-213.440, F.A.C.; Air Construction Permit AC41-204587]



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

**E.U.**

<b><u>ID No.</u></b>	<b><u>Brief Description</u></b>
-021	Steam Boiler

The Cleaver Brooks Model No. NCB700-250 package steam boiler is fired with (a) natural gas, (b) bio-gas, or (c) a mixture of natural gas and bio-gas. The maximum design heat input rate is 9.96 million Btu per hour.

Sulfur dioxide emissions are controlled by limiting the sulfur content of the bio-gas.

{Permitting note(s): This emission unit is regulated under Rule 62-212.400, F.A.C., Prevention of Significant Deterioration; 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 Emissions Units.}

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

**Essential Potential to Emit (PTE) Parameters**

**F.1. Capacity.** The maximum heat input to the Steam Boiler shall not exceed 9.96 million Btu per hour.

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; Air Construction Permit AC41-204588]

**F.2. Methods of Operation - (i.e., Fuels)** The Steam Boiler shall be fired with natural gas and/or bio-gas only. Bio-gas and natural gas may be mixed and burned simultaneously.

[Rules 62-4.160(2), and 62-213.440(1), F.A.C.; Air Construction Permit AC41-204588 and BACT Determination dated October 13, 1992]

**Emission Limitations and Standards**

**F.3.** Visible emissions shall not exceed 20% opacity except for one six-minute period per hour during which opacity shall not exceed 27%.

[Rule 62-296.406(1), F.A.C.]

**F.4. Overall SO<sub>2</sub> Emission Limit Cap** - Total sulfur dioxide (SO<sub>2</sub>) emissions from the Glass Plant No. 2 furnace, the Glass Plant No. 3 Furnace, the Anaerobic Reactor w/Biogas Flare, and the Cleaver Brooks Steam Boiler resulting from the combustion of biogas shall not exceed either of the following:

- a. 6.9 pounds per hour on a calendar monthly average basis;
- b. 30.22 tons in any consecutive 12 month period.

[Rule 62-212.400(1)(c), F.A.C.; Air Construction Permit 0810007-006-AC]

**Test Methods and Procedures**

**F.5.** Test the visible emissions (VE) from the Steam Boiler exhaust, annually on or during the 60 day period prior to March 18 (See Condition F.6.).

[Rule 62-297.310(7)(a)(4), F.A.C.]

**F.6.** Compliance with the emission limitation of Condition F.3 shall be determined using DEP Method 9 contained in Chapter 62-297, F.A.C. The minimum requirements for stack sampling facilities, source sampling and reporting, shall be in accordance with Chapter 62-297, F.A.C. and 40 CFR 60, Appendix A.

[Chapter 62-297, F.A.C.]

**F.7.** The sulfur content of the bio-gas shall be determined in accordance with Tropicana's Environmental Laboratory's Procedure "H<sub>2</sub>S Determination Using Sulfur Chemiluminescence Detector", Reference ASTM Method D 5504-94.

[Rule 62-4.070(3), F.A.C.; Air Construction Permit AC41-204588 as amended March 27, 1996]

**Recordkeeping and Reporting Requirements**

**F.8. Additional Recordkeeping Requirements** - To demonstrate compliance with the overall biogas combustion sulfur dioxide (SO<sub>2</sub>) emission limits in this permit, the permittee shall maintain a monthly Biogas SO<sub>2</sub> Emissions Log which shall:

- a. Record daily biogas production (ft<sup>3</sup> biogas/day), and weekly H<sub>2</sub>S concentration (H<sub>2</sub>S ppmv) results. (Note: Biogas flow measured at 70°F.)
- b. Calculate total sulfur dioxide emissions resulting from the combustion of biogas in units of pounds per hour on a monthly average basis using the formula shown below. (Note: H<sub>2</sub>S density at 70°F: 0.0892 lb/ft<sup>3</sup>.)
- c. Calculate total sulfur dioxide (SO<sub>2</sub>) emissions resulting from the combustion of biogas in units of tons per month using the formula shown below.
- d. Calculate total sulfur dioxide (SO<sub>2</sub>) emissions (tons/year) for the most recent 12 consecutive month period.

The permittee shall complete the calculations in b. through d. by the 15th of the following month. These records shall be recorded in a permanent form suitable for inspection by the Department upon request and shall be retained for at least a five (5) year period.

**Formulas:**

$$\text{MO. AVG. H}_2\text{S ft}^3/\text{ft}^3 \text{ biogas} = (\text{MO. AVG. H}_2\text{S ppmv}) \times 10^{-6}$$

$$\text{Biogas SO}_2 \text{ emissions (lb/hr)} = (\text{MO. AVG. ft}^3 \text{ biogas/day}) \times (1 \text{ day/24 hr}) \times (0.0892 \text{ lb H}_2\text{S/ft}^3 \text{ H}_2\text{S}) \times (\text{MO. AVG. H}_2\text{S ft}^3/\text{ft}^3 \text{ biogas}) \times (64 \text{ lb SO}_2/34 \text{ lb H}_2\text{S})$$

Tropicana Products, Inc.  
Bradenton Citrus Processing Plant  
Page F3 of F2

**FINAL Permit No.:** 0810007-003-AV

Biogas SO<sub>2</sub> emissions (tons/month) = (Total ft<sup>3</sup> biogas/month) x (0.0892 lb H<sub>2</sub>S/ft<sup>3</sup> H<sub>2</sub>S) x  
(MO. AVG. H<sub>2</sub>S ft<sup>3</sup>/ft<sup>3</sup> biogas) x (64 lb SO<sub>2</sub>/34 lb H<sub>2</sub>S) x (1 ton SO<sub>2</sub>/2000 lb SO<sub>2</sub>)  
[Rule 62-213.440, F.A.C.; Air Construction Permit 0810007-006-AC]

# 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

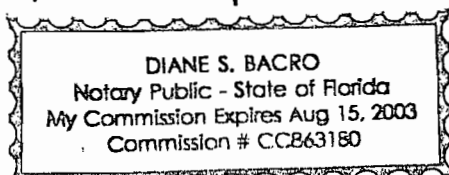
## STATE OF FLORIDA COUNTY OF MANATEE;

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, **4/17/03**

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  
17th Day of April, 2003



Diane S. Bacro

SEAL & Notary Public

Personally Known ☒ OR Produced Identification ☐  
Type of Identification Produced \_\_\_\_\_

## PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT

STATE OF FLORIDA  
DEPARTMENT OF  
ENVIRONMENTAL  
PROTECTION

DEP File No. 0810007-  
013-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: P.O. Box 338, Bradenton, Florida 34206. The project is to allow all of the biogas produced in a 12 consecutive month period to be burned by the Biogas Flare at the anaerobic reactor (Emissions Unit I.D.No.-022). The emissions cap associated with the combustion of the biogas will be accounted for at the flare and boiler, only.

Total emissions increase of sulfur dioxide from the combustion of all of the biogas produced in a 12 month period authorized by this permit will not exceed 26.52 tons per year. 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 Department's 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

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, 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 & 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, including the specific facts the petitioner contends warrant reversal or modification of the agency's action; and

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

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

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

Department of Environmental Protection  
Bureau of Air Regulation  
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.

4/17/03

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

7000 2870 0000 7028 1013

Mr. Michael Haycock, Vice President, Mfg.

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

Postmark  
 Here

**Sent To**

Mr. Michael Haycock, Vice President, Mfg.

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

P. O. Box 338

City, State, ZIP+

Bradenton, FL 34206

PS Form 3800, May 2000

See Reverse for Instructions

**SENDER: COMPLETE THIS SECTION**

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

**1 Article Addressed to:**

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

**COMPLETE THIS SECTION ON DELIVERY**

**A. Signature**

x *Earl E. Alonzo*

☐ Agent

☐ Addressee

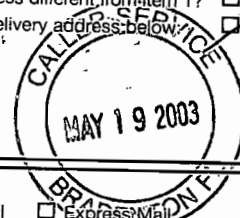
**B. Received by (Printed Name)**

*Earl E. Alonzo*

**C. Date of Delivery**

**D. Is delivery address different from item 1? ☐ Yes**

If YES, enter delivery address below: ☐ No



**3. Service Type**

☒ Certified Mail

☐ Express Mail

☐ Registered

☐ Return Receipt for Merchandise

☐ Insured Mail

☐ C.O.D.

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

☐ Yes

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102595-02-M-1540

UNITED STATES POSTAL SERVICE



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DIVISION OF AIR RESOURCES MANAGEMENT  
BUREAU OF AIR REGULATION - FILE V.  
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TALLAHASSEE, FLORIDA 32399-2400

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M& 5508



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**OFFICIAL USE**

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Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
<b>Total Postage &amp; Fees</b>	<b>\$</b>

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Mr. Michael Haycock, Vice President

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

P.O. Box 338

City, State, ZIP+4

Bradenton, Florida 34206

PS Form 3800, May 2000

See Reverse for Instructions

**SENDER: COMPLETE THIS SECTION**

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

**1 Article Addressed to:**

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

**2 Article Number**

(Transfer from service label)

7000 2870 0000 7028 0856

**COMPLETE THIS SECTION ON DELIVERY**

**A. Signature**

X

*Earl F. White*

☐ Agent

☐ Addressee

**B. Received by (Printed Name)**

*Earl F. White*

**C. Date of Delivery**

**D. Is delivery address different from item 1? ☐ Yes**

If YES, enter delivery address below: ☐ No

**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



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DEPARTMENT OF ENVIRONMENTAL PROTECTION  
DIVISION OF AIR RESOURCES MANAGEMENT  
BUREAU OF AIR REGULATION - TITLE V  
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TALLAHASSEE, FLORIDA 32399-2400

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