

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
NOTICE OF FINAL PERMIT

In the Matter of an
Application for Permit by:

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

DEP File No. 0870007-010-AC
Waste Heat Evaporators
Manatee County

Enclosed is Final Permit Number 0870007-010-AC. This permit authorizes Tropicana Products, Inc. to install a new 120,000 pounds per hour waste heat evaporator on Citrus Peel Dryer No. 3 and to add the 50,000 pounds per hour waste heat evaporator from Citrus Peel Dryer No. 3 to Citrus Peel Dryer No. 2, at its existing facility located at 1001 13th Avenue, Bradenton, Manatee County. This permit is issued pursuant to Chapter 403, Florida Statutes.

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

Executed in Tallahassee, Florida.



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

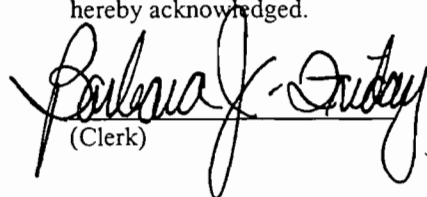
CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Notice of Final Permit (including the Final permit) was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 10/14/02 to the person(s) listed:

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

Clerk Stamp

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

 10/14/02
(Clerk) (Date)

SENDER: COMPLETE THIS SECTION

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

1. Article Addressed to:

Mr. Donald Antenore,
Vice President, Mfg.
P.O. Box 338
Bradenton, Florida 34206

2. Article Number (Copy from service label)

7000 0600 0021 6524 2878

PS Form 3811, July 1999

Domestic Return Receipt

102595-00-M-0952

COMPLETE THIS SECTION ON DELIVERY

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

Danny Andrews 10-16-02

C. Signature

X Danny Andrews ☐ Agent ☐ Addressee

D. Is delivery address different from item 1? ☐ YesIf 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**U.S. Postal Service****CERTIFIED MAIL RECEIPT**

(Domestic Mail Only; No Insurance Coverage Provided)

Article Sent To:

Mr. Donald Antenore

Postage \$

Certified Fee

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

Total Postage & Fees \$

Postmark
Here

Name (Please Print Clearly) (to be completed by mailer)

Mr. Donald Antenore

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

P.O. Box 338

City, State, ZIP+4

Bradenton, Florida 34206

PS Form 3800, July 1999

See Reverse for Instructions

1 APPLICANT NAME AND ADDRESS

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

Authorized Representative: Donald Antenore, Vice President, Mfg.

2 FACILITY DESCRIPTION, PROJECT DETAILS AND RULE APPLICABILITY

The facility is an existing citrus juice processing facility. The project is the installation of waste heat evaporators. The new waste heat evaporator is available from another citrus processing plant. Currently there are three waste heat evaporators associated with the three existing citrus peel dryers. Citrus Peel Dryer No. 1 has a waste heat evaporator rated at 100,000 pounds per hour and Citrus Peel Dryers Nos. 2 and 3 each have 50,000 pounds per hour waste heat evaporators. The waste heat evaporator from Citrus Peel Dryer No. 3 will be connected to Citrus Peel Dryer No. 2, giving it an evaporative capacity of 100,000 pounds per hour. The new 120,000 pounds per hour waste heat evaporator will be installed on Citrus Peel Dryer No. 3. No change will be made to Citrus Peel Dryer No. 1. 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

<u>No.</u>	<u>Brief Description</u>
-001	Citrus Peel Dryer No. 1 with waste heat evaporator
-002	Citrus Peel Dryer No. 2 with waste heat evaporator
-003	Citrus Peel Dryer No. 3 with waste heat evaporator

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

Pollutant	Net Increase ¹	PSD Significance	Subject to PSD?
PM/ PM ₁₀	0.0	25/15	No
VOC	0.0	40	No

¹ Potential emissions increases (shown as net increase) were estimated by the Department. Waste heat evaporators use no fuel and an actual decrease in the emissions of these pollutants are expected.

The proposed project is subject to preconstruction review requirements under the provisions of Chapter 403, F.S., and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297, F.A.C. The existing facility is located in an area designated, in accordance with Rule 62-204.340, F.A.C., as attainment or unclassifiable for the criteria pollutants ozone, PM₁₀, carbon monoxide, SO₂, nitrogen dioxide and lead. This facility is classified as a Major or Title V Source of air pollution because emissions of at least one regulated air pollutant exceeds 100 tons per year (TPY). The Department has previously found that citrus juice processing facilities such as this facility have potential emissions of VOC exceeding 250 TPY.

This facility is not within an industry included in the list of the 28 Major Facility Categories per Table 212.400-1 of Chapter 62-212, F.A.C. Because emissions are greater than 250 TPY for at least one criteria pollutant (VOC), the facility is also an existing Major Facility with respect to Rule 62-212.400, F.A.C., Prevention of Significant Deterioration (PSD). The net increase in emissions of PM/PM₁₀ and VOC do not exceed the PSD significance levels of Table 212.400-2, F.A.C. Therefore, the project is not subject to PSD requirements of Rule 62-212.400, F.A.C., for these pollutants.

The 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.

4 EXCESS EMISSIONS

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

5 LIMITS AND COMPLIANCE REQUIREMENTS

The permit maintains the previously established limits on the operation of the three citrus peel dryers. 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 permit to allow the installation of the waste heat evaporators, subject to the terms and conditions of the draft permit.

7 FINAL DETERMINATION

An "INTENT TO ISSUE AIR CONSTRUCTION PERMIT" to Tropicana Products, Inc. for their existing citrus juice processing plant located at 1001 13th Avenue, Bradenton, Manatee County was clerked on September 12, 2002. The "PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT" was published in the Bradenton Herald on September 17, 2002. The Draft Air Construction Permit was available for public inspection at the Southwest District office in Tampa and the permitting authority's office in Tallahassee. Proof of publication of the "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" was received on September 26, 2002.

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
Mail Station #5505
2600 Blair Stone Road
Tallahassee, Florida 32399-2400
Telephone: 850/488-0114



Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

PERMITTEE

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

Permit No.	0810007-010-AC
Project	Waste Heat Evaporators
SIC No.	2033, 2037, 2048
Expires:	October 31, 2005

Authorized Representative:

Donald Antenore, Vice President, Mfg.

PROJECT AND LOCATION

This permit authorizes Tropicana Products, Inc. to install a new 120,000 pounds per hour waste heat evaporator on Citrus Peel Dryer No. 3 and to add the 50,000 pounds per hour waste heat evaporator from Citrus Peel Dryer No. 3 to Citrus Peel Dryer No. 2.

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

STATEMENT OF BASIS

This construction permit is issued under the provisions of Chapter 403 of the Florida Statutes (F.S.), and the Florida Administrative Code (F.A.C.) Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297.

The above named permittee is authorized to construct the emissions units in accordance with the conditions of this permit and as described in the application, approved drawings, plans, and other documents on file with the Department of Environmental Protection (Department).

APPENDICES

The attached appendix is a part of this permit:

Appendix GC General Permit Conditions

Howard L. Rhodes, Director
Division of Air Resource Management

AIR CONSTRUCTION PERMIT
SECTION I. FACILITY INFORMATION

FACILITY AND PROJECT DESCRIPTION

The facility is an existing citrus juice processing facility. The project is the installation of waste heat evaporators. The new waste heat evaporator is available from another citrus processing plant. Currently there are three waste heat evaporators associated with the three existing citrus peel dryers. Citrus Peel Dryer No. 1 has a waste heat evaporator rated at 100,000 pounds per hour and Citrus Peel Dryers Nos. 2 and 3 each have 50,000 pounds per hour waste heat evaporators. The waste heat evaporator from Citrus Peel Dryer No. 3 will be connected to Citrus Peel Dryer No. 2, giving it an evaporative capacity of 100,000 pounds per hour. The new 120,000 pounds per hour waste heat evaporator will be installed on Citrus Peel Dryer No. 3. No change will be made to Citrus Peel Dryer No. 1. 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 are approximately: PM/PM₁₀, 0.0 and VOC, 0.0. The facility information, project scope, emissions and rule applicability are described in detail in the Department's Technical Evaluation and Determination.

REVIEWING AND PROCESS SCHEDULE

August 1, 2002	Received permit application (no application fee required)
August 1, 2002	Application complete
September 12, 2002	Distributed Notice of Intent to Issue and supporting documents
September 17, 2002	Notice of Intent published in the Bradenton Herald

RELEVANT DOCUMENTS

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

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

AIR CONSTRUCTION PERMIT
SECTION II. FACILITY-WIDE SPECIFIC CONDITIONS

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

ADMINISTRATIVE

1. Regulating Agencies: All documents related to applications for permits to construct, operate or modify an emissions unit should be submitted to the Bureau of Air Regulation (BAR), Florida Department of Environmental Protection at Mail Station #5505, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, phone number 850/488-0114. All documents related to reports, tests, minor modifications and notifications shall be submitted to the Department's Southwest District office at 3804 Coconut Palm Drive, Tampa, Florida 33619-8218, and phone number 813-744-6100.
2. General Conditions: The owner and operator is subject to and shall operate under the attached General Permit Conditions G.1 through G.15 listed in Appendix GC of this permit. General Permit Conditions are binding and enforceable pursuant to Chapter 403 of the Florida Statutes. [Rule 62-4.160, F.A.C.]
3. Terminology: The terms used in this permit have specific meanings as defined in the corresponding chapters of the Florida Administrative Code.
4. Applicable Regulations, Forms and Application Procedures: Unless otherwise indicated in this permit, the construction and operation of the subject emissions unit shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of Chapter 403, F.S. and Florida Administrative Code Chapters 62-4, 62-110, 62-204, 62-212, 62-213, 62-296, 62-297 and the Code of Federal Regulations Title 40, Part 60, adopted by reference in the Florida Administrative Code (F.A.C.) regulations. The permittee shall use the applicable forms listed in Rule 62-210.900, F.A.C. and follow the application procedures in Chapter 62-4, F.A.C. Issuance of this permit does not relieve the facility owner or operator from compliance with any applicable federal, state, or local permitting or regulations. [Rules 62-204.800, 62-210.300 and 62-210.900, F.A.C.]
5. New or Additional Conditions: Pursuant to Rule 62-4.080, F.A.C., for good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]
6. Expiration: This air construction permit shall expire on October 31, 2005. The permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the Department's Bureau of Air Regulation prior to 60 days before the expiration of the permit. [Rules 62-210.300(1), 62-4.070(4), 62-4.080, and 62-4.210, F.A.C.]
7. Modifications: No emissions unit or facility subject to this permit shall be constructed or modified without obtaining an air construction permit from the Department. Such permit must be obtained prior to the beginning of construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]
8. Title V Operation Permit Required: This permit authorizes construction and/or installation of the permitted emissions unit and initial operation to determine compliance with Department rules. A revision to the Title V operation permit is required for regular operation of the permitted emissions unit. The owner or operator shall apply for a Title V operation permit at least ninety days prior to

AIR CONSTRUCTION PERMIT

SECTION II. FACILITY-WIDE SPECIFIC CONDITIONS

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

OPERATIONAL REQUIREMENTS

9. Plant Operation - Problems: If temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by hazard of fire, wind or by other cause, the permittee shall immediately notify the Department's Southwest District office. The notification shall include pertinent information as to the cause of the problem, and what steps are being taken to correct the problem and to prevent its recurrence, and where applicable, the owner's intent toward reconstruction of destroyed facilities. Such notification does not release the permittee from any liability for failure to comply with Department rules. [Rule 62-4.130, F.A.C.]
10. Circumvention: No person shall circumvent any air pollution control device or allow the emission of air pollutants without the applicable air pollution control device operating properly. [Rule 62-210.650, F.A.C.]
11. Excess Emissions: This permit does not change any authorization for excess emissions provided by other Department permits for other emissions units. The following excess emissions provisions of state rule apply to these emissions units (emissions units 001, 002, and 003) as specified below. These provisions cannot be used to vary any NSPS requirements applicable to this emissions unit.
 - (a) Excess emissions resulting from start-up and shutdown are permitted for emissions units 001, 002, and 003, providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized, but in no case exceed two hours in any 24 hour period.
 - (b) Excess emissions resulting from malfunction of these emissions units shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized, but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration.
 - (c) Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during start-up, shutdown, or malfunction shall be prohibited.

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

AIR CONSTRUCTION PERMIT

SECTION II. FACILITY-WIDE SPECIFIC CONDITIONS

COMPLIANCE MONITORING AND TESTING REQUIREMENTS

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

- (a) Required Equipment. The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.
- (b) Accuracy of Equipment. Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.

REPORTING AND RECORD KEEPING REQUIREMENTS

13. Duration of Record Keeping: Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least five years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule. [Rules 62-4.160(14)(a)&(b) and 62-213.440(1)(b)2.b., F.A.C.]
14. Excess Emissions Report: In case of excess emissions resulting from malfunction, the owner or operator shall notify the Department's Southwest District office within one working day of: the nature, extent, and duration of the excess emissions; the cause of the excess emissions; and the actions taken to correct the problem. In addition, the Department may request a written summary report of the incident. A full written report on the malfunctions shall be submitted in a quarterly report if requested by the Department. [Rules 62-4.130 and 62-210.700(6), F.A.C.]
15. Annual Operating Report for Air Pollutant Emitting Facility: The Annual Operating Report for Air Pollutant Emitting Facility shall be completed each year and shall be submitted to the Department's Southwest District office and, if applicable, the appropriate local program by March 1 of the following year. [Rule 62-210.370(3), F.A.C.]

AIR CONSTRUCTION PERMIT
SECTION III. EMISSIONS UNITS SPECIFIC CONDITIONS

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

E.U. ID

<u>No.</u>	<u>Brief Description</u>
-001	Citrus Peel Dryer No. 1 with waste heat evaporator
-002	Citrus Peel Dryer No. 2 with waste heat evaporator
-003	Citrus Peel Dryer No. 3 with waste heat evaporator

Citrus Peel Dryer Nos. 1, 2, and 3 each include a citrus pulp dehydrator associated with a waste heat evaporator (WHE). Each dehydrator is designed to evaporate a maximum of 60,000 pounds per hour of water, fired with natural gas, with No. 2 fuel oil with a maximum sulfur content of 0.5% as a backup fuel, at a maximum design heat input rate of 84 million (MM) BTU per hour. Dehydrator No. 1 is associated with a WHE designed to evaporate 100,000 pounds per hour of water from the press liquor process stream. Dehydrator No. 2 is associated with two WHEs each designed to evaporate 50,000 pounds per hour of water from the press liquor. Dehydrator No. 3 is associated with a WHE designed to evaporate 120,000 pounds per hour of water from the press liquor process stream. Each dehydrator processes a maximum of about 100,000 pounds per hour of pressed peel containing about 70% moisture and Brix citrus molasses. Each evaporator processes a maximum of about 66,000 pounds per hour of 9 degrees Brix press liquor and converts it to about 29,700 pounds per hour at about 20 degrees Brix. Each dehydrator and associated WHE produce a maximum of 40,000 pounds per hour of dried peel at approximately 9% moisture.

{Permitting note(s): These emissions units are regulated under 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

1. Capacity.

- a. The maximum process input rate to each peel dryer shall not exceed 50.0 tons per hour of pressed wet citrus peel.
- b. The maximum heat input to the dehydrator shall not exceed 84 MMBtu per hour when firing natural gas. [Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

2. Methods of Operation - (i.e., Fuels).

Each dehydrator shall be fired with natural gas as the primary fuel with No. 2 fuel oil as a backup fuel to be used no more than 600 hours per 12 consecutive month period. The No. 2 fuel oil shall contain no more than 0.5% sulfur, by weight. [Rules 62-210.200(PTE), 62-4.160(2), and 62-213.440(1), F.A.C.]

AIR CONSTRUCTION PERMIT
SECTION III. EMISSIONS UNITS SPECIFIC CONDITIONS

Emission Limitations and Standards

3. Particulate matter emissions shall not exceed any of the following limits:

Emissions Unit	Maximum Allowable Emissions	
	Pounds per Hour ¹	Tons per Year
001, Citrus Peel Dryer No. 1	32.4	139.41
002, Citrus Peel Dryer No. 2	32.4	139.41
003, Citrus Peel Dryer No. 3	32.4	138.1

¹Based upon the Process Weight Table equations below for the maximum permitted process rate of 50 tons per hour for each dryer.

Where: E = Emission limit in pounds/hour, and

P = Process weight rate (input process rate to the dehydrator) in tons per hour,

(i) $E = (3.59) P^{0.62}$, where P is less than or equal to 30 tons/hour, or

(ii) $E = (17.31) P^{0.16}$, where P is greater than 30 tons/hour. [Rule 62-296.320(4)(a), F.A.C.; Air Operation Permit 0810007-002-AO]

4. Visible emissions from these emission units shall not be equal to or greater than 20% opacity. [Rule 62-296.320(4)(b)1., F.A.C.]

Test Methods and Procedures

5. The permittee shall test for particulate matter and visible emissions from the Citrus Peel Dryers Nos. 1, 2 and 3 on, or during the 60 day period prior to March 11.

{Permitting Note: The compliance test due date is for planning purposes only. Rule 62-297.310(7)(a)4, F.A.C. allows the permittee to conduct a formal compliance test any time during the federal fiscal year (October 1 – September 30).}

Emission testing shall be conducted while operating each dryer within 90 - 100% of the maximum process input rate of 50 tons/hr., when practical. If it is not practical to test at the maximum process input rate, then the source may be tested at a lower rate. A compliance test submitted at a rate less than 90% of the maximum permitted rate shown above will automatically constitute an amended permit at 110% of the test rate. Once the unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity*.

* Clarification: When a unit is limited to an operating rate at 110% of the tested rate, the permittee may provide notice of an additional test (as in notification condition 16). That notice may specify a 15 day period when the unit will be allowed to operate at higher capacities for the purpose of

AIR CONSTRUCTION PERMIT

SECTION III. EMISSIONS UNITS SPECIFIC CONDITIONS

additional testing. For example, the first five days of the 15 day period may be used to bring the unit up to a higher production level; the next five days may be used for the tests themselves. After the final test, the unit must be returned to the capacity which existed prior to the most recent test. Upon written approval by the Department of the most recent test results, the unit may then operate at 110% of the most recent test load, not to exceed the maximum permitted rate.

The test results shall be submitted to the Air Compliance Section of this office within 45 days of testing. Acceptance of the test by this office will automatically constitute an amended permit at the higher tested rate plus 10%, but in no case shall the maximum permitted rate shown above be exceeded. Failure to submit the following records with the test report may invalidate the test and fail to provide reasonable assurance of compliance:

- The pressed wet peel input rate to the dryer during the test.
- The natural gas or fuel oil usage rate to the dryer during the test.
- If applicable, documentation of the fuel oil's type and sulfur content that was used during the test.
- The WHEs operating parameters, which would indicate proper operation of the water spray nozzles, shall be recorded during the particulate emission compliance test. These WHE operating parameters could include water spray rate (gallons/minute), water feed pump/spray operating pressure, or other parameters that are used to control and monitor the operation of the WHE. The permittee shall provide to the Department a monitoring plan of the proposed operating parameters to be used to monitor proper operation of the WHEs within 60 days of the effective date of this permit. (Note: The parameter(s) and their operating levels during the compliance test will be used to provide reasonable assurance on an ongoing basis that the unit is being operated normally and in compliance with the standards - See Condition No. 11.). At least one reading shall be taken and recorded during each run of the particulate emission compliance test and the readings shall be included with any peel dryer test report. [Rules 62-297.310(2) and 62-4.070(3), F.A.C.]

6. Compliance with the emission limitations of Conditions 3 and 4 shall be determined using EPA Methods 1, 2, 3, 4, 5, and 9 contained in 40 CFR 60, Appendix A and adopted by reference in Chapter 62-297, F.A.C. The EPA Method 9 test shall be conducted by a certified observer and be a minimum of sixty (60) minutes in duration. The minimum requirements for stationary point source emission test procedures and reporting shall be in accordance with 40 CFR 60 Appendix A and Chapter 62-297, F.A.C. [Chapter 62-297, F.A.C.]
7. Compliance testing of the dryer/waste heat evaporator shall be conducted when firing No. 2 fuel oil if fuel oil has been used in the dryer for more than 400 hours for the previous 12 months, or if it is expected to be used in the dryer for more than 400 hours during the next 12 months. If the test is conducted while firing natural gas and in the 12 month period following the test No. 2 fuel oil is burned for more than 400 hours, then an additional VE test (while burning No. 2 oil in the dryer) shall be conducted within 30 days of having passed the 400 hour fuel oil burning level. The permittee shall submit a statement of the fuel operating mode (type of fuel and heat input rate) as a part of the compliance test report. Failure to submit the fuel operation mode statement may invalidate the data and fail to provide reasonable assurance of compliance. [Rule 62-4.070(3), F.A.C.]

AIR CONSTRUCTION PERMIT

SECTION III. EMISSIONS UNITS SPECIFIC CONDITIONS

8. If particulate and visible emission testing is conducted while firing No. 2 fuel oil, compliance with the No. 2 oil sulfur content limitation in Condition 2 shall be demonstrated during the test through submission of either of the following with the test report:
- Results of fuel oil analysis from the fuel oil vendor showing the sulfur content representative of the fuel fired during the compliance test;
 - Results of a fuel oil analysis showing the sulfur content for a fuel oil sample taken during the compliance test. [Rule 62-213.440, F.A.C.]

Monitoring, Recordkeeping and Reporting Requirements

9. In order to document compliance with the Conditions 1 and 2, the permittee shall maintain a record of fuel oil firing in each dehydrator. The records shall include the following for each period fuel oil is fired:
- date;
 - beginning and end time of fuel oil firing;
 - calculated duration of fuel oil firing (hours) for the above period; and
 - accumulated hours of fuel oil firing for the most recent 12 month period (hours/12 consecutive month period).
- In addition to the above operation records the permittee shall maintain records of the sulfur content of all fuel oil delivered for use in each dehydrator. These records may be based on vendor supplied analysis data or upon analysis of samples taken on site at the plant. These records shall be recorded in a permanent form suitable for inspection by the Department upon request. [Rule 62-213.440(1), F.A.C.]
10. In order to document compliance with Condition 1, the permittee shall maintain monthly records of the weight of wet peel input processed and/or dried peel produced for each dryer. These records shall be recorded in a permanent form suitable for inspection by the Department upon request. [Rule 62-4.070(3), F.A.C.]
11. Waste Heat Evaporator (WHE) operating parameters shall be maintained at a minimum of 90% of the values measured and recorded during the most recent particulate matter emission compliance test. WHE parameters shall be recorded at least once during each 8-hour shift. [Rules 62-210.650 and 62-213.440(1), F.A.C.]

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

- G.1 The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
- G.2 This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings or exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
- G.3 As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey and vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
- G.4 This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
- G.5 This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
- G.6 The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
- G.7 The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:
- (a) Have access to and copy and records that must be kept under the conditions of the permit;
 - (b) Inspect the facility, equipment, practices, or operations regulated or required under this permit, and
 - (c) Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

- G.8 If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:
- (a) A description of and cause of non-compliance; and
 - (b) The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

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

- G.9 In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.
- G.10 The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.
- G.11 This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.
- G.12 This permit or a copy thereof shall be kept at the work site of the permitted activity.
- G.13 This permit also constitutes:
- (a) Determination of Best Available Control Technology ();
 - (b) Determination of Prevention of Significant Deterioration (); and
 - (c) Compliance with New Source Performance Standards ().
- G.14 The permittee shall comply with the following:
- (a) Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
 - (b) The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application or this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
 - (c) Records of monitoring information shall include:
 - 1. The date, exact place, and time of sampling or measurements;
 - 2. The person responsible for performing the sampling or measurements;
 - 3. The dates analyses were performed;
 - 4. The person responsible for performing the analyses;
 - 5. The analytical techniques or methods used; and
 - 6. The results of such analyses.
- G.15 When requested by the Department, the permittee shall within a reasonable time furnish any information, required by law, which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

Memorandum

Florida Department of Environmental Protection

TO: Howard L. Rhodes

THRU: Scott Sheplak *SS* *ay*

FROM: Edward Svec *ES*

DATE: October 2, 2002

SUBJECT: Tropicana Products, Inc.
Waste Heat Evaporators
DEP File No: 0870007-010-AC

Attached for approval and signature is a final air construction permit for Tropicana Products, Inc., Bradenton Plant. The permit allows the installation of a new 120,000 pounds per hour waste heat evaporator on Citrus Peel Dryer No. 3 and to add the 50,000 pounds per hour waste heat evaporator from Citrus Peel Dryer No. 3 to Citrus Peel Dryer No. 2. 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.

November 14, 2002 is day 90.

SMS/es
Attachments

Tropicana®

RECEIVED

SEP 26 2002

BUREAU OF AIR REGULATION

CERTIFIED MAIL-RETURN RECEIPT
September 20, 2002

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

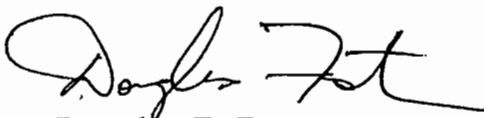
**RE: DEP FILE NO. 0810007-010-AC
WASTE HEAT EVAPORATORS**

Dear Mr. Svec:

Enclosed please find an affidavit of publication of the Notice of Intent to Issue Air Construction Permit to Tropicana Products, Inc., to allow installation of waste heat evaporators at its Bradenton facility.

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

Sincerely,



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

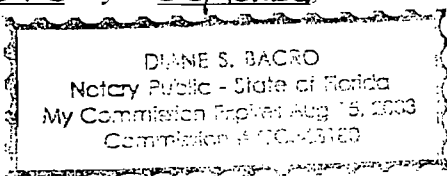
STATE OF FLORIDA
COUNTY OF MANATEE;

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, **9/17,'02**

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

Sandy Riley
(Signature of Affiant)

Sworn to and subscribed before me this
18th Day of September 2002



Diane S. Bacro

SEAL & Notary Public

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

PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT

STATE OF FLORIDA
DEPARTMENT OF
ENVIRONMENTAL
PROTECTION
DEP FILE No.
0810007-010-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 Ave., Bradenton, Manatee County, Florida. The applicant's mailing address: P.O. Box 338, Bradenton, Florida 34206. The permit is for the installation of waste heat evaporators. The new waste heat evaporator is available from another citrus processing plant. Currently there are three waste heat evaporators associated with the three existing citrus peel dryers. Citrus Peel Dryer No. 1 has a waste heat evaporator rated at 100,000 pounds per hour and Citrus Peel Dryers Nos. 2 and 3 each have 50,000 pounds per hour waste heat evaporators. The waste heat evaporator from Citrus Peel Dryer No. 3 will be connected to Citrus Peel Dryer No. 2, giving it an evaporative capacity of 100,000 pounds per hour. The new 120,000 pounds per hour waste heat evaporator will be installed on Citrus Peel Dryer No. 3. No change will be made to Citrus Peel Dryer No. 1.

Total emissions of pollutants from the installation of the waste heat evaporators authorized by this permit will not exceed the following approximate annual emission rates in tons per year: PM, 0.0, VOC, 0.0.

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 pro-

posed action;
(d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate;
(e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's action; and
(f) A statement of specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and
(g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

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

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

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

Dept. of Environmental Protection
Bureau of Air Regulation
Suite 4,

111 S. Magnolia Dr.
Tallahassee, FL 32301
phone 850-488-0114
FAX: 850-922-6979

Dept. of Environmental Protection
Southwest District
3804 Coconut Palm Dr.

Tampa, FL 33619-8218
phone: 813/744-6100

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

posed permit and require, if applicable, another Public Notice. The Department will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to sections 120.569 and 120.57 F.S. before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below. Mediation is not available in this proceeding. A person whose substantial interests are project, Edward J. Syec, at the Bureau of Air Regulation in Tallahassee, Florida, or Call 850-488-0114, for additional information. Written comments directed to the Department's reviewing engineer should be sent to the following mailing address: Dept. of Environmental Protection, Bureau of Air Regulation, Mail Station #5505, Tallahassee, Florida 32399-2400. 9/17/02

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

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

(a) The name & address of each agency affected and each agency's file or identification number, if known;

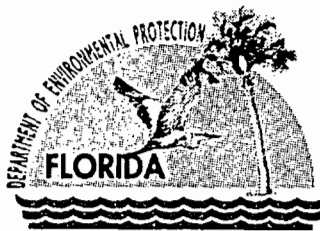
(b) The name, address and telephone number of the petitioner, the name, address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination;

(c) A statement of how and when petitioner received notice of the agency's action or pro-

BUREAU OF AIR REGULATION

SEP 26 2002

RECEIVED



Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

September 12, 2002

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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

Re: DEP File No. 0810007-010-AC
Waste Heat Evaporators

Dear Mr. Antenore:

Enclosed is one copy of the draft air construction permit to Tropicana Products, Inc. to allow the installation of a new 120,000 pounds per hour waste heat evaporator on Citrus peel Dryer No. 3 and the addition of the 50,000 pounds per hour evaporator from Citrus peel Dryer No. 3 to Citrus peel Dryer No. 2, at its 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. Failure to publish the notice and provide proof of publication may result in the denial of the permit.

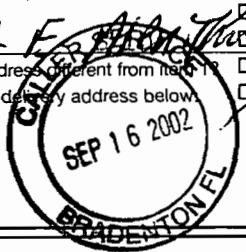
Please submit any written comments you wish to have considered concerning the Department's proposed action to Scott M. Sheplak, P.E., Administrator, Title V Section at the above letterhead address. If you have any other questions, please contact Edward J. Svec at 850/921-8985.

Sincerely,

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

AAL/es

Enclosures

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> ■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. ■ Print your name and address on the reverse so that we can return the card to you. ■ Attach this card to the back of the mailpiece, or on the front if space permits. 	<div style="display: flex; justify-content: space-between;"> <div style="width: 60%;"> <p>A. Received by (Please Print Clearly) <i>Donald F. Celluto</i></p> <p>C. Signature <i>Donald F. Celluto</i></p> </div> <div style="width: 35%;"> <p>B. Date of Delivery</p> </div> </div> <div style="display: flex; justify-content: space-between;"> <div style="width: 60%;"> <p><input checked="" type="checkbox"/> <i>Real Estate</i></p> <p>D. Is delivery address different from item 1? If YES, enter delivery address below.</p> </div> <div style="width: 35%;"> <p><input checked="" type="checkbox"/> Agent <input checked="" type="checkbox"/> Addressee</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> </div> </div> <div style="text-align: center; margin: 10px 0;">  </div> <div style="display: flex; justify-content: space-between;"> <div style="width: 60%;"> <p>3. Service Type</p> <p><input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail</p> <p><input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise</p> <p><input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p> </div> <div style="width: 35%;"> <p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p> </div> </div>
<p>2. Article Number (Copy from service label)</p> <p style="text-align: center; font-size: 1.2em;">7000 0600 0021 6524 3158</p>	
<div style="display: flex; justify-content: space-between; font-size: 0.8em;"> PS Form 3811, July 1999 Domestic Return Receipt 102595-00-M-0952 </div>	

7000 0600 0021 6524 3158

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

Article Sent To:

Mr. Donald Antenore

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

Name (Please Print Clearly) (to be completed by mailer)

Mr. Donald Antenore

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

P.O. Box 338

City, State, ZIP+4

Bradenton, Florida 34206

PS Form 3800, July 1999
See Reverse for Instructions

In the Matter of an
Application for Permit by:

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

DEP File No. 0810007-010-AC
Waste Heat Evaporators
Manatee County

INTENT TO ISSUE AIR CONSTRUCTION PERMIT

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

The applicant, Tropicana Products, Inc., applied on August 1, 2002, to the Department for an air construction permit for its existing citrus juice processing facility located at 1001 13th Avenue, Bradenton, Manatee County. The permit is for the installation of waste heat evaporators. The new waste heat evaporator is available from another citrus processing plant. Currently there are three waste heat evaporators associated with the three existing citrus peel dryers. Citrus Peel Dryer No. 1 has a waste heat evaporator rated at 100,000 pounds per hour and Citrus Peel Dryers Nos. 2 and 3 each have 50,000 pounds per hour waste heat evaporators. The waste heat evaporator from Citrus Peel Dryer No. 3 will be connected to Citrus Peel Dryer No. 2, giving it an evaporative capacity of 100,000 pounds per hour. The new 120,000 pounds per hour waste heat evaporator will be installed on Citrus Peel Dryer No. 3. No change will be made to Citrus Peel Dryer No. 1.

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

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

Pursuant to Section 403.815, F.S., and Rule 62-110.106(7)(a)1., F.A.C., you (the applicant) are required to publish at your own expense the enclosed Public Notice of Intent to Issue Air Construction Permit. The notice shall be published one time only in the legal advertisement section of a newspaper of general circulation in the area affected. Rule 62-110.106(7)(b), F.A.C., requires that the applicant cause the notice to be published as soon as possible after notification by the Department of its intended action. For the purpose of these rules, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. If you are uncertain that a newspaper meets these requirements, please contact the Department at the address or telephone number listed below. The applicant shall provide proof of publication to the Department's Bureau of Air Regulation, at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400 (Telephone: 850/488-0114; Fax 850/ 922-6979). You must provide proof of publication within seven days of publication, pursuant to Rule 62-110.106(5), F.A.C. No permitting action for which published notice is required shall be granted until proof of publication of notice is made by furnishing a uniform affidavit in substantially the form prescribed in section 50.051, F.S. to the office of the Department issuing the permit. Failure to publish the notice and provide proof of publication may result in the denial of the permit pursuant to Rules 62-110.106(9) & (11), F.A.C.

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

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

The Department will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to sections 120.569 and 120.57 F.S., before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below.

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

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

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

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

Mediation is not available in this proceeding.

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


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

of the underlying statute (implemented by the rule); and (h) A statement whether the variance or waiver is permanent or temporary and, if temporary, a statement of the dates showing the duration of the variance or waiver requested.

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

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

Executed in Tallahassee, Florida.



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

CERTIFICATE OF SERVICE

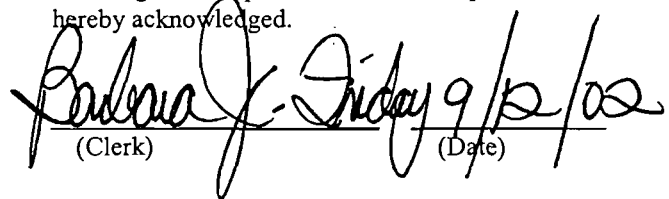
The undersigned duly designated deputy agency clerk hereby certifies that this Intent to Issue Air Construction Permit (including the Public Notice of Intent to Issue Air Construction Permit, Technical Evaluation and Preliminary Determination, and the Draft permit) was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 9/12/02 to the person(s) listed:

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

9/12/02 cc: Ed Svec
Reading File

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) 9/12/02

PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

DEP File No. 0810007-010-AC

Tropicana Products, Inc.
Manatee County

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit to Tropicana Products, Inc. for its existing citrus juice processing facility located at 1001 13th Avenue, Bradenton, Manatee County. The applicant's mailing address is: PO Box 338, Bradenton, Florida 34206. The permit is for the installation of waste heat evaporators. The new waste heat evaporator is available from another citrus processing plant. Currently there are three waste heat evaporators associated with the three existing citrus peel dryers. Citrus Peel Dryer No. 1 has a waste heat evaporator rated at 100,000 pounds per hour and Citrus Peel Dryers Nos. 2 and 3 each have 50,000 pounds per hour waste heat evaporators. The waste heat evaporator from Citrus Peel Dryer No. 3 will be connected to Citrus Peel Dryer No. 2, giving it an evaporative capacity of 100,000 pounds per hour. The new 120,000 pounds per hour waste heat evaporator will be installed on Citrus Peel Dryer No. 3. No change will be made to Citrus Peel Dryer No. 1.

Total emissions of pollutants from the installation of the waste heat evaporators authorized by this permit will not exceed the following approximate annual emission rates in tons per year: PM, 0.0, VOC, 0.0.

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

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

The Department will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to sections 120.569 and 120.57 F.S., before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below.

Mediation is not available in this proceeding.

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

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

NOTICE TO BE PUBLISHED IN THE NEWSPAPER

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

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

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

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

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

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

The complete project file includes the application, technical evaluations, draft permit, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Administrator, 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

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

1 APPLICANT NAME AND ADDRESS

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

Authorized Representative: Donald Antenore, Vice President, Mfg.

2 FACILITY DESCRIPTION, PROJECT DETAILS AND RULE APPLICABILITY

The facility is an existing citrus juice processing facility. The project is the installation of waste heat evaporators. The new waste heat evaporator is available from another citrus processing plant. Currently there are three waste heat evaporators associated with the three existing citrus peel dryers. Citrus Peel Dryer No. 1 has a waste heat evaporator rated at 100,000 pounds per hour and Citrus Peel Dryers Nos. 2 and 3 each have 50,000 pounds per hour waste heat evaporators. The waste heat evaporator from Citrus Peel Dryer No. 3 will be connected to Citrus Peel Dryer No. 2, giving it an evaporative capacity of 100,000 pounds per hour. The new 120,000 pounds per hour waste heat evaporator will be installed on Citrus Peel Dryer No. 3. No change will be made to Citrus Peel Dryer No. 1. 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

<u>No.</u>	<u>Brief Description</u>
-001	Citrus Peel Dryer No. 1 with waste heat evaporator
-002	Citrus Peel Dryer No. 2 with waste heat evaporator
-003	Citrus Peel Dryer No. 3 with waste heat evaporator

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

Pollutant	Net Increase ¹	PSD Significance	Subject to PSD?
PM/ PM ₁₀	0.0	25/15	No
VOC	0.0	40	No

¹ Potential emissions increases (shown as net increase) were estimated by the Department. Waste heat evaporators use no fuel and an actual decrease in the emissions of these pollutants are expected.

The proposed project is subject to preconstruction review requirements under the provisions of Chapter 403, F.S., and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297, F.A.C. The existing facility is located in an area designated, in accordance with Rule 62-204.340, F.A.C., as attainment or unclassifiable for the criteria pollutants ozone, PM₁₀, carbon monoxide, SO₂, nitrogen dioxide and lead. This facility is classified as a Major or Title V Source of air pollution because emissions of at least one regulated air pollutant exceeds 100 tons per year (TPY). The Department has previously found that citrus juice processing facilities such as this facility have potential emissions of VOC exceed 250 TPY.

This facility is not within an industry included in the list of the 28 Major Facility Categories per Table 62-212.400-1 of Chapter 62-212, F.A.C. Because emissions are greater than 250 TPY for at least one criteria pollutant (VOC), the facility is also an existing Major Facility with respect to Rule 62-212.400, Prevention of Significant Deterioration (PSD). The net increase in emissions of PM/PM₁₀ and VOC do not exceed the PSD significance levels of Table 212.400-2, F.A.C. Therefore the project is not subject to PSD requirements of Rule 62-212.400, F.A.C., for these pollutants.

The 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.

4 EXCESS EMISSIONS

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

5 LIMITS AND COMPLIANCE REQUIREMENTS

The permit maintains the previously established limits on the operation of the three citrus peel dryers. 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 installation of the waste heat evaporators, 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

Permit No.	0810007-010-AC
Project	Waste Heat Evaporators
SIC No.	2033, 2037, 2048
Expires:	^DRAFT

Authorized Representative:

Donald Antenore, Vice President, Mfg.

PROJECT AND LOCATION

This permit authorizes Tropicana Products, Inc. to install a new 120,000 pounds per hour waste heat evaporator on Citrus Peel Dryer No. 3 and to add the 50,000 pounds per hour waste heat evaporator from Citrus Peel Dryer No. 3 to Citrus Peel Dryer No. 2.

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

STATEMENT OF BASIS

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

APPENDICES

The attached appendix is a part of this permit:

Appendix GC General Permit Conditions

DRAFT

Howard L. Rhodes, Director
Division of Air Resources
Management

AIR CONSTRUCTION PERMIT
SECTION I. FACILITY INFORMATION

FACILITY AND PROJECT DESCRIPTION

The facility is an existing citrus juice processing facility. The project is the installation of waste heat evaporators. The new waste heat evaporator is available from another citrus processing plant. Currently there are three waste heat evaporators associated with the three existing citrus peel dryers. Citrus Peel Dryer No. 1 has a waste heat evaporator rated at 100,000 pounds per hour and Citrus Peel Dryers Nos. 2 and 3 each have 50,000 pounds per hour waste heat evaporators. The waste heat evaporator from Citrus Peel Dryer No. 3 will be connected to Citrus Peel Dryer No. 2, giving it an evaporative capacity of 100,000 pounds per hour. The new 120,000 pounds per hour waste heat evaporator will be installed on Citrus Peel Dryer No. 3. No change will be made to Citrus Peel Dryer No. 1. 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 are approximately: PM/PM₁₀, 0.0 and VOC, 0.0. The facility information, project scope, emissions and rule applicability are described in detail in the Department's Technical Evaluation and Determination.

REVIEWING AND PROCESS SCHEDULE

August 1, 2002	Received permit application (no application fee required)
August 1, 2002	Application complete
^DRAFT	Distributed Notice of Intent to Issue and supporting documents
^DRAFT	Notice of Intent published in ^DRAFT

RELEVANT DOCUMENTS

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

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

AIR CONSTRUCTION PERMIT
SECTION II. FACILITY-WIDE SPECIFIC CONDITIONS

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

ADMINISTRATIVE

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

AIR CONSTRUCTION PERMIT

SECTION II. FACILITY-WIDE SPECIFIC CONDITIONS

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

OPERATIONAL REQUIREMENTS

9. Plant Operation - Problems: If temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by hazard of fire, wind or by other cause, the permittee shall immediately notify the Department's Southwest District office. The notification shall include pertinent information as to the cause of the problem, and what steps are being taken to correct the problem and to prevent its recurrence, and where applicable, the owner's intent toward reconstruction of destroyed facilities. Such notification does not release the permittee from any liability for failure to comply with Department rules. [Rule 62-4.130, F.A.C.]
10. Circumvention: No person shall circumvent any air pollution control device or allow the emission of air pollutants without the applicable air pollution control device operating properly. [Rule 62-210.650, F.A.C.]
11. Excess Emissions: This permit does not change any authorization for excess emissions provided by other Department permits for other emissions units. The following excess emissions provisions of state rule apply to these emissions units (emissions units 001, 002, and, 003) as specified below. These provisions cannot be used to vary any NSPS requirements applicable to this emissions unit.
 - (a) Excess emissions resulting from start-up and shutdown are permitted for emissions units 001, 002, and, 003 providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized, but in no case exceed two hours in any 24 hour period.
 - (b) Excess emissions resulting from malfunction of this emissions unit shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized, but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration.
 - (c) Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during start-up, shutdown, or malfunction shall be prohibited.

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

AIR CONSTRUCTION PERMIT
SECTION II. FACILITY-WIDE SPECIFIC CONDITIONS

COMPLIANCE MONITORING AND TESTING REQUIREMENTS

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

- (a) **Required Equipment.** The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.
- (b) **Accuracy of Equipment.** Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.

REPORTING AND RECORD KEEPING REQUIREMENTS

- 13. Duration of Record Keeping:** Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least five years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule. [Rules 62-4.160(14)(a)&(b) and 62-213.440(1)(b)2.b., F.A.C.]
- 14. Excess Emissions Report:** In case of excess emissions resulting from malfunction, the owner or operator shall notify the Department's Southwest District office within one working day of: the nature, extent, and duration of the excess emissions; the cause of the excess emissions; and the actions taken to correct the problem. In addition, the Department may request a written summary report of the incident. A full written report on the malfunctions shall be submitted in a quarterly report if requested by the Department. [Rules 62-4.130 and 62-210.700(6), F.A.C.]
- 15. Annual Operating Report for Air Pollutant Emitting Facility:** The Annual Operating Report for Air Pollutant Emitting Facility shall be completed each year and shall be submitted to the Department's Southwest District office and, if applicable, the appropriate local program by March 1 of the following year. [Rule 62-210.370(3), F.A.C.]

AIR CONSTRUCTION PERMIT

SECTION III. EMISSIONS UNITS SPECIFIC CONDITIONS

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

E.U. ID

<u>No.</u>	<u>Brief Description</u>
-001	Citrus Peel Dryer No. 1 with waste heat evaporator
-002	Citrus Peel Dryer No. 2 with waste heat evaporator
-003	Citrus Peel Dryer No. 3 with waste heat evaporator

Citrus Peel Dryer Nos. 1, 2, and 3 each include a citrus pulp dehydrator associated with a waste heat evaporator (WHE). Each dehydrator is designed to evaporate a maximum of 60,000 pounds per hour of water, fired with natural gas, with No. 2 fuel oil with a maximum sulfur content of 0.5% as a backup fuel, at a maximum design heat input rate of 84 million (MM) BTU per hour. Dehydrator No. 1 is associated with a WHE designed to evaporate 100,000 pounds per hour of water from the press liquor process stream. Dehydrator No. 2 is associated with two WHEs each designed to evaporate 50,000 pounds per hour of water from the press liquor. Dehydrator No. 3 is associated with a WHE designed to evaporate 120,000 pounds per hour of water from the press liquor process stream. Each dehydrator processes a maximum of about 100,000 pounds per hour of pressed peel containing about 70% moisture and Brix citrus molasses. Each evaporator processes a maximum of about 66,000 pounds per hour of 9 degrees Brix press liquor and converts it to about 29,700 pounds per hour at about 20 degrees Brix. Each dehydrator and associated WHE produce a maximum of 40,000 pounds per hour of dried peel at approximately 9% moisture.

{Permitting note(s): These emissions units are regulated under 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

1. Capacity.

- The maximum process input rate to each peel dryer shall not exceed 50.0 tons per hour of pressed wet citrus peel.
- The maximum heat input to the dehydrator shall not exceed 84 MMBtu per hour when firing natural gas. [Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

2. Methods of Operation - (i.e., Fuels).

Each dehydrator shall be fired with natural gas as the primary fuel with No. 2 fuel oil as a backup fuel to be used no more than 600 hours per 12 consecutive month period. The No. 2 fuel oil shall contain no more than 0.5% sulfur, by weight. [Rules 62-210.200(PTE), 62-4.160(2), and 62-213.440(1), F.A.C.]

AIR CONSTRUCTION PERMIT
SECTION III. EMISSIONS UNITS SPECIFIC CONDITIONS

Emission Limitations and Standards

3. Particulate matter emissions shall not exceed any of the following limits:

Emissions Unit	Maximum Allowable Emissions	
	Pounds per Hour ¹	Tons per Year
001, Citrus Peel Dryer No. 1	32.4	139.41
002, Citrus Peel Dryer No. 2	32.4	139.41
003, Citrus Peel Dryer No. 3	32.4	138.1

¹Based upon the Process Weight Table equations below for the maximum permitted process rate of 50 tons per hour for each dryer.

Where: E = Emission limit in pounds/hour, and

P = Process weight rate (input process rate to the dehydrator) in tons per hour,

- (i) $E = (3.59) P^{0.62}$, where P is less than or equal to 30 tons/hour, or
- (ii) $E = (17.31) P^{0.16}$, where P is greater than 30 tons/hour. [Rule 62-296.320(4)(a), F.A.C.; Air Operation Permit 0810007-002-AO]
4. Visible emissions from these emission units shall not be equal to or greater than 20% opacity. [Rule 62-296.320(4)(b)(1), F.A.C.]

Test Methods and Procedures

5. The permittee shall test for particulate matter and visible emissions from the Citrus Peel Dryer Nos. 1, 2 and 3 on, or during the 60 day period prior to March 11.
{Permitting Note: The compliance test due date is for planning purposes only. Rule 62-297.310(7)(a)4, F.A.C. allows the permittee to conduct a formal compliance test any time during the federal fiscal year (October 1 – September 30).}

Emission testing shall be conducted while operating each dryer within 90 - 100% of the maximum process input rate of 50 tons/hr., when practical. If it is not practical to test at the maximum process input rate, then the source may be tested at a lower rate. A compliance test submitted at a rate less than 90% of the maximum permitted rate shown above will automatically constitute an amended permit at 110% of the test rate. Once the unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity*.

* Clarification: When a unit is limited to an operating rate at 110% of the tested rate, the permittee may provide notice of an additional test (as in notification condition 16). That notice may specify a 15 day period when the unit will be allowed to operate at higher capacities for the purpose of

AIR CONSTRUCTION PERMIT

SECTION III. EMISSIONS UNITS SPECIFIC CONDITIONS

additional testing. For example, the first five days of the 15 day period may be used to bring the unit up to a higher production level; the next five days may be used for the tests themselves. After the final test, the unit must be returned to the capacity which existed prior to the most recent test. Upon written approval by the Department of the most recent test results, the unit may then operate at 110% of the most recent test load, not to exceed the maximum permitted rate.

The test results shall be submitted to the Air Compliance Section of this office within 45 days of testing. Acceptance of the test by this office will automatically constitute an amended permit at the higher tested rate plus 10%, but in no case shall the maximum permitted rate shown above be exceeded. Failure to submit the following records with the test report may invalidate the test and fail to provide reasonable assurance of compliance:

- The pressed wet peel input rate to the dryer during the test.
 - The natural gas or fuel oil usage rate to the dryer during the test.
 - If applicable, documentation of the fuel oil's type and sulfur content that was used during the test.
 - The WHEs operating parameters, which would indicate proper operation of the water spray nozzles, shall be recorded during the particulate emission compliance test. These WHE operating parameters could include water spray rate (gallons/minute), water feed pump/spray operating pressure, or other parameters that are used to control and monitor the operation of the WHE. The permittee shall provide to the Department a monitoring plan of the proposed operating parameters to be used to monitor proper operation of the WHEs within 60 days of the effective date of this permit. (Note: The parameter(s) and their operating levels during the compliance test will be used to provide reasonable assurance on an ongoing basis that the unit is being operated normally and in compliance with the standards - See Condition No. A.11.) At least one reading shall be taken and recorded during each run of the particulate emission compliance test and the readings shall be included with any peel dryer test report. [Rules 62-297.310(2) and 62-4.070(3), F.A.C.]
6. Compliance with the emission limitations of Conditions 3 and 4 shall be determined using EPA Methods 1, 2, 3, 4, 5, and 9 contained in 40 CFR 60, Appendix A and adopted by reference in Chapter 62-297, F.A.C. The EPA Method 9 test shall be conducted by a certified observer and be a minimum of sixty (60) minutes in duration. The minimum requirements for stationary point source emission test procedures and reporting shall be in accordance with 40 CFR 60 Appendix A and Chapter 62-297, F.A.C. [Chapter 62-297, F.A.C.]
7. Compliance testing of the dryer/waste heat evaporator shall be conducted when firing No. 2 fuel oil if fuel oil has been used in the dryer for more than 400 hours for the previous 12 months, or if it is expected to be used in the dryer for more than 400 hours during the next 12 months. If the test is conducted while firing natural gas and in the 12 month period following the test No. 2 fuel oil is burned for more than 400 hours, then an additional VE test (while burning No. 2 oil in the dryer) shall be conducted within 30 days of having passed the 400 hour fuel oil burning level. The permittee shall submit a statement of the fuel operating mode (type of fuel and heat input rate) as a part of the compliance test report. Failure to submit the fuel operation mode statement may invalidate the data and fail to provide reasonable assurance of compliance. [Rule 62-4.070(3), F.A.C.]

AIR CONSTRUCTION PERMIT

SECTION III. EMISSIONS UNITS SPECIFIC CONDITIONS

8. If particulate and visible emission testing is conducted while firing No. 2 fuel oil, compliance with the No. 2 oil sulfur content limitation in Condition 2 shall be demonstrated during the test through submission of either of the following with the test report:
- a. Results of fuel oil analysis from the fuel oil vendor showing the sulfur content representative of the fuel fired during the compliance test;
 - b. Results of a fuel oil analysis showing the sulfur content for a fuel oil sample taken during the compliance test. [Rule 62-213.440, F.A.C.]

Monitoring, Recordkeeping and Reporting Requirements

9. In order to document compliance with the Conditions 1 and 2, the permittee shall maintain a record of fuel oil firing in each dehydrator. The records shall include the following for each period fuel oil is fired:
- a. date;
 - b. beginning and end time of fuel oil firing;
 - c. calculated duration of fuel oil firing (hours) for the above period; and
 - d. accumulated hours of fuel oil firing for the most recent 12 month period (hours/12 consecutive month period).
- In addition to the above operation records the permittee shall maintain records of the sulfur content of all fuel oil delivered for use in each dehydrator. These records may be based on vendor supplied analysis data or upon analysis of samples taken on site at the plant. These records shall be recorded in a permanent form suitable for inspection by the Department upon request. [Rule 62-213.440(1), F.A.C.]
10. In order to document compliance with Condition 1, the permittee shall maintain monthly records of the weight of wet peel input processed and/or dried peel produced for each dryer. These records shall be recorded in a permanent form suitable for inspection by the Department upon request. [Rule 62-4.070(3), F.A.C.]
11. Waste Heat Evaporator (WHE) operating parameters shall be maintained at a minimum of 90% of the values measured and recorded during the most recent particulate matter emission compliance test. WHE parameters shall be recorded at least once during each 8-hour shift. [Rules 62-210.650 and 62-213.440(1), F.A.C.]

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

- G.1 The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
- G.2 This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings or exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
- G.3 As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey and vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
- G.4 This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
- G.5 This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
- G.6 The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
- G.7 The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:
- (a) Have access to and copy and records that must be kept under the conditions of the permit;
 - (b) Inspect the facility, equipment, practices, or operations regulated or required under this permit, and,
 - (c) Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.
- Reasonable time may depend on the nature of the concern being investigated.
- G.8 If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:
- (a) A description of and cause of non-compliance; and
 - (b) The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

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

- G.9 In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.
- G.10 The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.
- G.11 This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.
- G.12 This permit or a copy thereof shall be kept at the work site of the permitted activity.
- G.13 This permit also constitutes:
- (a) Determination of Best Available Control Technology ();
 - (b) Determination of Prevention of Significant Deterioration (); and
 - (c) Compliance with New Source Performance Standards (X).
- G.14 The permittee shall comply with the following:
- (a) Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
 - (b) The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application or this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
 - (c) Records of monitoring information shall include:
 - 1. The date, exact place, and time of sampling or measurements;
 - 2. The person responsible for performing the sampling or measurements;
 - 3. The dates analyses were performed;
 - 4. The person responsible for performing the analyses;
 - 5. The analytical techniques or methods used; and
 - 6. The results of such analyses.
- G.15 When requested by the Department, the permittee shall within a reasonable time furnish any information, required by law, which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.



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

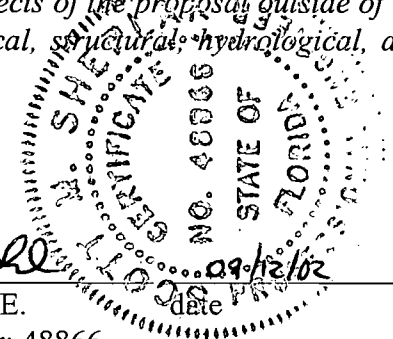
Permittee:

Tropicana Products, Inc.
Bradenton Plant

Permit No.: 0810007-010-AC

Project type: Air Construction Permit

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



Scott M. Sheplak


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

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

Memorandum

Florida Department of Environmental Protection

TO: 
Scott Sheplak

FROM: Ed Svec 

DATE: September 4, 2002

SUBJECT: Tropicana Products, Inc.
Waste Heat Evaporators

Attached for approval and signature is an intent to issue a construction permit to allow Tropicana Products, Inc. to install a new 120,000 pounds per hour waste heat evaporator on Citrus Peel Dryer No. 3 and to add the 50,000 pounds per hour waste heat evaporator from Citrus Peel Dryer No. 3 to Citrus Peel Dryer No. 2.

This project is not subject to PSD because the associated emissions increases are not significant for PSD. Total emissions of pollutants from this project will not exceed the approximate annual emission rates in tons per year: PM, 0.0; VOC, 0.0.

I recommend your approval and signature.

September 4, 2002 is day 34 of the 90 day timeclock.

Attachments

/es

Golder Associates Inc.

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



July 31, 2002

023-7563

Florida Department of Environmental Protection
Bureau of Air Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

RECEIVED

AUG 01 2002

Attention: Mr. C.H. Fancy, P.E., Chief

BUREAU OF AIR REGULATION

RE: Tropicana Products, Inc.
Bradenton Citrus Processing Facility
Facility I.D. 0810007+

Dear Clair:

On behalf of Tropicana Products, Inc., please find attached 4 copies of a permit application for the installation of a waste heat evaporator (WHE) at the Tropicana Bradenton Citrus Processing Facility. The WHE is available from an existing citrus processing facility (Florida Global) and will be installed on Citrus Dryer No. 3. Currently there are three WHEs associated with Citrus Dryers Nos. 1, 2 and 3 with rated evaporation of 100,000 lb/hr, 50,000 lb/hr and 50,000 lb/hr. The two existing 50,000 lb/hr WHEs will be combined into a single 100,000 lb/hr WHE and connected to Citrus Dryer No. 2. The new WHE for Citrus Dryer No. 3 is rated at 120,000 lb/hr.

The project will result in an increase in the recovery of d'limonene with concomitant reduction in volatile organic emissions (VOCs) of about 450 tons/year. As a result, this project will not trigger review under the Department's PSD rules in 62-212.400 F.A.C or is a modification as defined in 62-210.200 F.A.C. In addition, the WHE acts as a medium wet scrubber and the increase in evaporative capability would be a benefit in removal of particulate matter.

An expeditious review would be appreciated. Please call if you have any questions.

Sincerely,

GOLDER ASSOCIATES INC.

Kennard F. Kosky, P.E.
Principal

KFK/arz

cc: Scott Sheplak, P.E., FDEP
Donald Antenore, Tropicana Products, Inc.
Douglas Foster, Tropicana Products, Inc.

G:\Projects\2002\0237563 Tropicana\4\4.1\1.073102-WHE.doc

E. Sullivan
G. Kissel, SWD

RECEIVED

AUG 01 2002

BUREAU OF AIR REGULATION

**APPLICATION FOR AIR PERMIT
WASTE HEAT EVAPORATORS
FOR TROPICANA PRODUCTS, INC.
BRADENTON CITRUS PROCESSING FACILITY**

Prepared For:

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

Prepared By:

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

**July 2002
0237563**

DISTRIBUTION:

4 Copies - FDEP

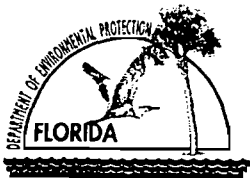
2 Copies - Tropicana Products, Inc.

1 Copy - Golder Associates Inc.

PART I

APPLICATION FOR AIR PERMIT

LONG FORM



Department of Environmental Protection

Division of Air Resources Management

APPLICATION FOR AIR PERMIT - TITLE V SOURCE

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

I. APPLICATION INFORMATION

Identification of Facility

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

Application Contact

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

Application Processing Information (DEP Use)

1. Date of Receipt of Application:	8-1-02
2. Permit Number:	0810007 - 010-AC
3. PSD Number (if applicable):	
4. Siting Number (if applicable):	

Purpose of Application

Air Operation Permit Application

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

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

Current construction permit number: _____

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

Current construction permit number: _____

Operation permit number to be revised: _____

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

Operation permit number to be revised/corrected: _____

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

Operation permit number to be revised: _____

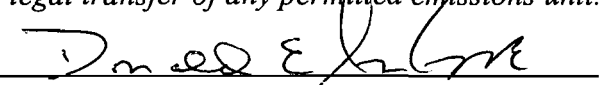
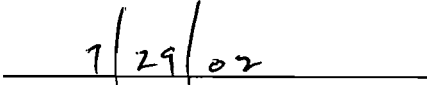
Reason for revision: _____

Air Construction Permit Application

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

- ☒ Air construction permit to construct or modify one or more emissions units.
- ☐ Air construction permit to make federally enforceable an assumed restriction on the potential emissions of one or more existing, permitted emissions units.
- ☐ Air construction permit for one or more existing, but unpermitted, emissions units.

Owner/Authorized Representative or Responsible Official

1. Name and Title of Owner/Authorized Representative or Responsible Official: Donald Antenore, Vice President, Manufacturing
2. Owner/Authorized Representative or Responsible Official Mailing Address: Organization/Firm: Tropicana Products, Inc. Street Address: P.O. Box 338 City: Bradenton State: FL Zip Code: 34206
3. Owner/Authorized Representative or Responsible Official Telephone Numbers: Telephone: (941) 742 - 3349 Fax: (941) 749 - 2049
4. Owner/Authorized Representative or Responsible Official Statement: <i>I, the undersigned, am the owner or authorized representative*(check here [X], if so) or the responsible official (check here [], if so) of the Title V source addressed in this application, whichever is applicable. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof. I understand that a permit, if granted by the Department, cannot be transferred without authorization from the Department, and I will promptly notify the Department upon sale or legal transfer of any permitted emissions unit.</i>  Signature  Date

* Attach letter of authorization if not currently on file.

Professional Engineer Certification

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

*Board of Professional Engineers Certificate 00001670

RECEIVED
AUG 01 2002
BUREAU OF AIR REGULATION

Gary M. Rodkin
President



DESIGNATION OF DOCUMENT SIGNATORY

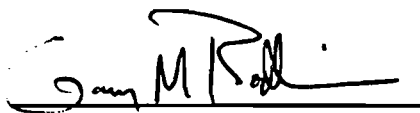
I, Gary M. Rodkin, hereby certify that I am the Executive Vice President of Tropicana Products, Inc., ("Tropicana") and as such I am authorized to designate employees to prepare and sign documents and to certify on behalf of said company the accuracy and completeness of information in such documents.

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

This designation is effective until revoked in writing.

Designated Signatory

Donald E. Antenore
Vice President, Manufacturing
1001 13th Avenue East
Bradenton, FL 34208



Gary M. Rodkin
Executive Vice President

Dated: 8/1/98

4. Professional Engineer Statement:

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

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

(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.

If the purpose of this application is to obtain a Title V source air operation permit (check here [], if so), I further certify that each emissions unit described in this Application for Air Permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance schedule is submitted with this application.

If the purpose of this application is to obtain an air construction permit for one or more proposed new or modified emissions units (check here [X], if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.

If the purpose of this application is to obtain an initial air operation permit or operation permit revision for one or more newly constructed or modified emissions units (check here [], if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.

Signature

Date

(seal)

Attach any exception to certification statement.

Scope of Application

Emissions Unit ID	Description of Emissions Unit	Permit Type	Processing Fee
001	Citrus Peel Dryer No. 1 with WHE		
002	Citrus Peel Dryer No. 2 with WHE		
003	Citrus Peel Dryer No. 3 with WHE		

Application Processing Fee

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

Construction/Modification Information

1. Description of Proposed Project or Alterations:

Citrus Peel Dryers Nos. 1, 2, and 3 have associated waste heat evaporators (WHE) designed to evaporate 100,000 lb/hr, 50,000 lb/hr, and 50,000 lb/hr respectively. The proposed project involves adding a 120,000 lb/hr WHE for Citrus Peel Dryer No. 3 and combining the 50,000 lb/hr WHE's into one 100,000 lb/hr WHE for Citrus Peel Dryer No. 2.

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

3. Projected Date of Completion of Construction: **1 Sept 2003**

Application Comment

There is no air emissions increase associated with the project. The additional evaporation will recover about 450 tons per year of VOCs in the form of citrus oil (i.e., d'limonene). The Project will also reduce particulate matter emissions due to the increased scrubbing capacity.

See Attachment Part II.

II. FACILITY INFORMATION

A. GENERAL FACILITY INFORMATION

Facility Location and Type

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

Facility Contact

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

Check all that apply:

List of Applicable Regulations

DEP Form No. 62-210.900(1) - Form
Effective: 2/11/99

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: [] Attached, Document ID: _____ [X] Not Applicable
9. List of Equipment/Activities Regulated under Title VI: [] Attached, Document ID: _____ [] Equipment/Activities On site but Not Required to be Individually Listed [X] Not Applicable
10. Alternative Methods of Operation: [] Attached, Document ID: _____ [X] Not Applicable
11. Alternative Modes of Operation (Emissions Trading): [] Attached, Document ID: _____ [X] Not Applicable
12. Identification of Additional Applicable Requirements: [] Attached, Document ID: _____ [X] Not Applicable
13. Risk Management Plan Verification: [] Plan previously submitted to Chemical Emergency Preparedness and Prevention Office (CEPPO). Verification of submittal attached (Document ID: _____) or previously submitted to DEP (Date and DEP Office: _____) [] Plan to be submitted to CEPPO (Date required: _____) [X] Not Applicable
14. Compliance Report and Plan: [] Attached, Document ID: _____ [X] Not Applicable
15. Compliance Certification (Hard-copy Required): [] Attached, Document ID: _____ [X] Not Applicable

III. EMISSIONS UNIT INFORMATION

A separate Emissions Unit Information Section (including subsections A through J as required) must be completed for each emissions unit addressed in this Application for Air Permit. If submitting the application form in hard copy, indicate, in the space provided at the top of each page, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application.

A. GENERAL EMISSIONS UNIT INFORMATION
(All Emissions Units)

Emissions Unit Description and Status

1. Type of Emissions Unit Addressed in This Section: (Check one)			
<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):			
Citrus Peel Dryer No. 1 with Waste Heat Evaporator			
4. Emissions Unit Identification Number:		<input type="checkbox"/> No ID <input type="checkbox"/> ID Unknown	
ID: 001			
5. Emissions Unit Status Code:	6. Initial Startup Date:	7. Emissions Unit Major Group SIC Code:	8. Acid Rain Unit?
A		20	<input type="checkbox"/>
9. Emissions Unit Comment: (Limit to 500 Characters)			
Feed Mill No. 1 includes a citrus pulp dehydrator designed to evaporate 60,000 lb/hr of water from a max. throughput of 50 TPH of pressed peel, producing 40,000 lb/hr of dried peel. It is fired with natural gas with fuel oil backup; Max. heat input, 84 MMBtu/hr. The associated waste heat evaporator is designed to evaporate 100,000 lb/hr of water from pressed liquor, producing citrus molasses. See Attachment Part II.			

Emissions Unit Control Equipment

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

Wet Scrubber, medium efficiency for PM control

2. Control Device or Method Code(s): **2****Emissions Unit Details**

1. Package Unit:

Manufacturer:

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:	84	mmBtu/hr
2. Maximum Incineration Rate:	lb/hr	tons/day
3. Maximum Process or Throughput Rate:	100,000	lb/hr*
4. Maximum Production Rate:	40,000	lb/hr**
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):		
* pressed wet peel ** dried peel		

C. EMISSIONS UNIT REGULATIONS (Regulated Emissions Units Only)

List of Applicable Regulations

The proposed addition of the WHE does not change the applicable regulations for Citrus Peel Dryers Nos. 1, 2, and 3 as identified in the current Title V Permit No. 0810007-003-AV.

[illegible]

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? EU1		2. Emission Point Type Code: 3	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point): Gases from the dehydrator pass through the waste heat evaporator and exhaust from evaporator stack and relief stack.			
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common: EU2 and EU3			
5. Discharge Type Code: V	6. Stack Height: 95 feet	7. Exit Diameter: 3.2 feet	
8. Exit Temperature: 100 °F	9. Actual Volumetric Flow Rate: 17,000 acfm	10. Water Vapor: %	
11. Maximum Dry Standard Flow Rate: dscfm		12. Nonstack Emission Point Height: feet	
13. Emission Point UTM Coordinates: Zone: East (km): North (km):			
14. Emission Point Comment (limit to 200 characters): Exit diameter = 3.17 (rounded to 3.2).			

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

Segment Description and Rate: Segment 1 of 3

1. Segment Description (Process/Fuel Type) (limit to 500 characters): Industrial Processes – Food and Agriculture – Fuel Fired Equipment – Natural Gas: Process Heaters		
2. Source Classification Code (SCC): 3-02-900-03		3. SCC Units: Million Cubic Feet Burned
4. Maximum Hourly Rate: 0.088	5. Maximum Annual Rate: 775	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit: 950
10. Segment Comment (limit to 200 characters): Maximum hourly rate = 0.0884 (rounded to 0.088). Maximum annual rate = 774.6 (rounded to 775) based on minimum heat content. Maximum sulfur content – 1 gr / 100 cf		

Segment Description and Rate: Segment 2 of 3

1. Segment Description (Process/Fuel Type) (limit to 500 characters): Industrial Processes – Food and Agriculture – Fuel Fired Equipment – Residual Oil: Process Heaters		
2. Source Classification Code (SCC): 3-02-900-02		3. SCC Units: Thousand gallons burned
4. Maximum Hourly Rate: 0.56	5. Maximum Annual Rate: 336	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur: 1.0	8. Maximum % Ash: 0.1	9. Million Btu per SCC Unit: 150
10. Segment Comment (limit to 200 characters): Heat content (HHV) – minimum value. Annual rate = 600 hr / yr, used as backup fuel.		

E. SEGMENT (PROCESS/FUEL) INFORMATION
(All Emissions Units)**Segment Description and Rate:** Segment 3 of 3

1. Segment Description (Process/Fuel Type) (limit to 500 characters): Process Weight		
2. Source Classification Code (SCC):		3. SCC Units: Tons of Pressed Peel Processed
4. Maximum Hourly Rate: 50	5. Maximum Annual Rate: 438,000	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment (limit to 200 characters):		

Segment Description and Rate: Segment of

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

F. EMISSIONS UNIT POLLUTANTS
(All Emissions Units)

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
PM	002		EL
PM ₁₀	002		EL

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

Potential/Fugitive Emissions

1. Pollutant Emitted: PM	2. Total Percent Efficiency of Control: 90 %
3. Potential Emissions: 32.4 lb/hour 141.8 tons/year	4. Synthetically Limited? <input type="checkbox"/>
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 _____ to _____ tons/year	
6. Emission Factor: Process Weight Rate Reference: Rule	7. Emissions Method Code: 0
8. Calculation of Emissions (limit to 600 characters): $\text{lb/hr} = 17.31 \times (50 \text{ tons / hour})^{0.16} = 32.4$ $\text{TPY} = 32.4 \text{ lb/hr} \times 8,760 \text{ hr / yr} \times 1 \text{ ton / 2,000 lb} = 141.8$	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): Rule 62-296.320(4)(a)2., F.A.C. Emission (lb/hr) = 17.31 x (P)^{0.16}, where P = process rate (TPH). Control efficiency – 60 to 90%	

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: RULE	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units:	4. Equivalent Allowable Emissions: 32.4 lb/hour 141.8 tons/year
5. Method of Compliance (limit to 60 characters): Annual Compliance Test, EPA Method 5	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): Rule 62-296.320(4)(a)2., F.A.C.	

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

Potential/Fugitive Emissions

1. Pollutant Emitted: PM₁₀	2. Total Percent Efficiency of Control: 90 %
3. Potential Emissions: 32.4 lb/hour 141.8 tons/year	4. Synthetically Limited? []
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 _____ to _____ tons/year	
6. Emission Factor: Process Weight Rate Reference: Rule	7. Emissions Method Code: 0
8. Calculation of Emissions (limit to 600 characters): $\text{lb/hr} = 17.31 \times (50 \text{ tons / hour})^{0.16} = 32.4$ $\text{TPY} = 32.4 \text{ lb/hr} \times 8,760 \text{ hr / yr} \times 1 \text{ ton / 2,000 lb} = 141.8$	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): Rule 62-296.320(4)(a)2., F.A.C. Emission (lb/hr) = 17.31 x (P)^{0.16}, where P = process rate (TPH). Control efficiency – 60 to 90%	

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: RULE	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units:	4. Equivalent Allowable Emissions: 32.4 lb/hour 141.8 tons/year
5. Method of Compliance (limit to 60 characters): Annual Compliance Test, EPA Method 5	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): Rule 62-296.320(4)(a)2., F.A.C.	

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: VE20	2. Basis for Allowable Opacity: [<input checked="" type="checkbox"/>] Rule [<input type="checkbox"/>] Other
3. Requested Allowable Opacity: Normal Conditions: 20 % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance: Annual VE Test EPA Method 9	
5. Visible Emissions Comment (limit to 200 characters): Rule 62-296.320(4)(b), F.A.C.	

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 [X] Attached, Document ID: <u>Part II</u> [] 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

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):			
Citrus Peel Dryer No. 2 with Waste Heat Evaporator			
4. Emissions Unit Identification Number:		<input type="checkbox"/> No ID <input type="checkbox"/> ID Unknown	
ID: 002			
5. Emissions Unit Status Code:	6. Initial Startup Date:	7. Emissions Unit Major Group SIC Code:	8. Acid Rain Unit?
A		20	<input type="checkbox"/>
9. Emissions Unit Comment: (Limit to 500 Characters)			
Feed Mill No. 2 includes a citrus pulp dehydrator designed to evaporate 60,000 lb/hr of water from a max. throughput of 50 TPH of pressed peel, producing 40,000 lb/hr of dried peel. It is fired with natural gas with fuel oil backup; Max. heat input, 84 MMBtu/hr. The associated waste heat evaporator will evaporate 100,000 lb/hr of water from pressed liquor producing citrus molasses. See Attachment Part II.			

Emissions Unit Control Equipment

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

Wet Scrubber, medium efficiency for PM control2. Control Device or Method Code(s): **2****Emissions Unit Details**

1. Package Unit:

Manufacturer:

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:	84	mmBtu/hr
2. Maximum Incineration Rate:	lb/hr	tons/day
3. Maximum Process or Throughput Rate:	100,000	lb/hr*
4. Maximum Production Rate:	40,000	lb/hr**
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):		
* pressed wet peel ** dried peel		

C. EMISSIONS UNIT REGULATIONS
(Regulated Emissions Units Only)

List of Applicable Regulations

The proposed addition of the WHE does not change the applicable regulations for Citrus Peel Dryers Nos. 1, 2, and 3 as identified in the current Title V Permit No. 0810007-003-AV.

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? EU2		2. Emission Point Type Code: 3	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point): Gases from the dehydrator pass through the waste heat evaporator and exhaust from the evaporator stack and relief stack.			
5. ID Numbers or Descriptions of Emission Units with this Emission Point in Common: EU2 and EU3			
5. Discharge Type Code: V	6. Stack Height: 95 feet	7. Exit Diameter: 3.2 feet	
8. Exit Temperature: 100 °F	9. Actual Volumetric Flow Rate: 17,000 acfm	10. Water Vapor: %	
11. Maximum Dry Standard Flow Rate: dscfm		12. Nonstack Emission Point Height: feet	
13. Emission Point UTM Coordinates: Zone: East (km): North (km):			
14. Emission Point Comment (limit to 200 characters): Exit diameter = 3.17 (rounded to 3.2).			

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

Segment Description and Rate: Segment 1 of 3

1. Segment Description (Process/Fuel Type) (limit to 500 characters): Industrial Processes – Food and Agriculture – Fuel Fired Equipment – Natural Gas: Process Heaters		
2. Source Classification Code (SCC): 3-02-900-03		3. SCC Units: Million Cubic Feet Burned
4. Maximum Hourly Rate: 0.088	5. Maximum Annual Rate: 775	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit: 950
10. Segment Comment (limit to 200 characters): Maximum hourly rate = 0.0884 (rounded to 0.088). Maximum annual rate = 774.6 (rounded to 775) based on minimum heat content. Maximum sulfur content – 1 gr / 100 cf		

Segment Description and Rate: Segment 2 of 3

1. Segment Description (Process/Fuel Type) (limit to 500 characters): Industrial Processes – Food and Agriculture – Fuel Fired Equipment – Residual Oil: Process Heaters		
2. Source Classification Code (SCC): 3-02-900-02		3. SCC Units: Thousand gallons burned
4. Maximum Hourly Rate: 0.56	5. Maximum Annual Rate: 336	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur: 1.0	10. Maximum % Ash: 0.1	9. Million Btu per SCC Unit: 150
10. Segment Comment (limit to 200 characters): Heat content (HHV) – minimum value. Annual rate = 600 hr / yr, used as backup fuel.		

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

Segment Description and Rate: Segment 3 of 3

1. Segment Description (Process/Fuel Type) (limit to 500 characters): Process Weight		
2. Source Classification Code (SCC):		3. SCC Units: Tons of Pressed Peel Processed
4. Maximum Hourly Rate: 50	5. Maximum Annual Rate: 438,000	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment (limit to 200 characters):		

Segment Description and Rate: Segment ____ of ____

1. Segment Description (Process/Fuel Type) (limit to 500 characters):		
2. Source Classification Code (SCC):		3. SCC Units:
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	11. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment (limit to 200 characters):		

F. EMISSIONS UNIT POLLUTANTS
(All Emissions Units)

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
PM	002		EL
PM₁₀	002		EL

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

Potential/Fugitive Emissions

1. Pollutant Emitted: PM	2. Total Percent Efficiency of Control: 90 %
3. Potential Emissions: 32.4 lb/hour 141.8 tons/year	4. Synthetically Limited? []
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 _____ to _____ tons/year	
6. Emission Factor: Process Weight Rate Reference: Rule	7. Emissions Method Code: 0
8. Calculation of Emissions (limit to 600 characters): $\text{lb/hr} = 17.31 \times (50 \text{ tons / hour})^{0.16} = 32.4$ $\text{TPY} = 32.4 \text{ lb/hr} \times 8,760 \text{ hr / yr} \times 1 \text{ ton / 2,000 lb} = 141.8$	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): Rule 62-296.320(4)(a)2., F.A.C. Emission (lb/hr) = 17.31 x (P)^{0.16}, where P = process rate (TPH). Control efficiency – 60 to 90%	

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: RULE	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units:	4. Equivalent Allowable Emissions: 32.4 lb/hour 141.8 tons/year
5. Method of Compliance (limit to 60 characters): Annual Compliance Test, EPA Method 5	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): Rule 62-296.320(4)(a)2., F.A.C.	

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

Potential/Fugitive Emissions

1. Pollutant Emitted: PM₁₀	2. Total Percent Efficiency of Control: 90 %
3. Potential Emissions: 32.4 lb/hour 141.8 tons/year	4. Synthetically Limited? []
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 _____ to _____ tons/year	
6. Emission Factor: Process Weight Rate Reference: Rule	7. Emissions Method Code: 0
8. Calculation of Emissions (limit to 600 characters): $\text{lb/hr} = 17.31 \times (50 \text{ tons / hour})^{0.16} = 32.4$ $\text{TPY} = 32.4 \text{ lb/hr} \times 8,760 \text{ hr / yr} \times 1 \text{ ton / 2,000 lb} = 141.8$	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): Rule 62-296.320(4)(a)2., F.A.C. Emission (lb/hr) = 17.31 x (P)^{0.16}, where P = process rate (TPH). Control efficiency – 60 to 90%	

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: RULE	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units:	4. Equivalent Allowable Emissions: 32.4 lb/hour 141.8 tons/year
5. Method of Compliance (limit to 60 characters): Annual Compliance Test, EPA Method 5	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): Rule 62-296.320(4)(a)2., F.A.C.	

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: VE20	2. Basis for Allowable Opacity: <input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other
3. Requested Allowable Opacity: Normal Conditions: 20 % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance: Annual VE Test EPA Method 9	
5. Visible Emissions Comment (limit to 200 characters): Rule 62-296.320(4)(b), F.A.C.	

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):	

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

Visible Emissions Limitation: Visible Emissions Limitation 2 of 2

1. Visible Emissions Subtype: VE99	2. Basis for Allowable Opacity: [X] Rule [] Other
3. Requested Allowable Opacity: Normal Conditions: % Exceptional Conditions: 100 % Maximum Period of Excess Opacity Allowed: 60 min/hour	
4. Method of Compliance: Best Operational Practices	
5. Visible Emissions Comment (limit to 200 characters): Rule 62-210.700(1), F.A.C. allows excess emissions for 2 hr / 24 hr during startup, shutdown, and/or malfunction.	

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

Continuous Monitoring System: Continuous Monitor _____ of _____

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	[] Rule [] Other
4. Monitor Information: <div> <div>Manufacturer:</div> <div>Model Number:</div> </div> <div> <div>Serial Number:</div> </div>	
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 [X] Attached, Document ID: <u>Part II</u> [] 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

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):			
Citrus Peel Dryer No. 3 with Waste Heat Evaporator			
4. Emissions Unit Identification Number:		<input type="checkbox"/> No ID <input type="checkbox"/> ID Unknown	
ID: 003			
5. Emissions Unit Status Code:	6. Initial Startup Date:	7. Emissions Unit Major Group SIC Code:	8. Acid Rain Unit?
A		20	<input type="checkbox"/>
9. Emissions Unit Comment: (Limit to 500 Characters)			
Feed Mill No. 3 includes a citrus pulp dehydrator designed to evaporate 60,000 lb/hr of water from a max. throughput of 50 TPH of pressed peel, producing 40,000 lb/hr of dried peel. It is fired with natural gas, with fuel oil backup; Max. heat input, 84 MMBtu/hr. The associated waste heat evaporator will evaporate 120,000 lb/hr of water from press liquor, producing citrus molasses. See Attachment Part II.			

Emissions Unit Control Equipment

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

Wet Scrubber, medium efficiency for PM control2. Control Device or Method Code(s): **2****Emissions Unit Details**

1. Package Unit:

Manufacturer:

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:	84	mmBtu/hr
2. Maximum Incineration Rate:	lb/hr	tons/day
3. Maximum Process or Throughput Rate:	100,000	lb/hr*
4. Maximum Production Rate:	40,000	lb/hr**
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):		
* pressed wet peel ** dried peel		

C. EMISSIONS UNIT REGULATIONS (Regulated Emissions Units Only)

List of Applicable Regulations

[illegible]

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? EU3		2. Emission Point Type Code: 3	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point): Gases from the dehydrator pass through the waste heat evaporator and exhaust from the evaporator stack and relief stack.			
6. ID Numbers or Descriptions of Emission Units with this Emission Point in Common: EU2 and EU3			
5. Discharge Type Code: V	6. Stack Height: 95 feet	7. Exit Diameter: 3.2 feet	
8. Exit Temperature: 100 °F	9. Actual Volumetric Flow Rate: 17,000 acfm	10. Water Vapor: %	
11. Maximum Dry Standard Flow Rate: dscfm		12. Nonstack Emission Point Height: feet	
13. Emission Point UTM Coordinates: Zone: East (km): North (km):			
14. Emission Point Comment (limit to 200 characters): Exit diameter = 3.17 (rounded to 3.2).			

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

Segment Description and Rate: Segment 1 of 3

1. Segment Description (Process/Fuel Type) (limit to 500 characters): Industrial Processes – Food and Agriculture – Fuel Fired Equipment – Natural Gas: Process Heaters		
2. Source Classification Code (SCC): 3-02-900-03		3. SCC Units: Million Cubic Feet Burned
4. Maximum Hourly Rate: 0.088	5. Maximum Annual Rate: 775	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit: 950
10. Segment Comment (limit to 200 characters): Maximum hourly rate = 0.0884 (rounded to 0.088). Maximum annual rate = 774.6 (rounded to 775) based on minimum heat content. Maximum sulfur content – 1 gr / 100 cf		

Segment Description and Rate: Segment 2 of 3

1. Segment Description (Process/Fuel Type) (limit to 500 characters): Industrial Processes – Food and Agriculture – Fuel Fired Equipment – Residual Oil: Process Heaters		
2. Source Classification Code (SCC): 3-02-900-02		3. SCC Units: Thousand gallons burned
4. Maximum Hourly Rate: 0.56	5. Maximum Annual Rate: 336	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur: 1.0	12. Maximum % Ash: 0.1	9. Million Btu per SCC Unit: 150
10. Segment Comment (limit to 200 characters): Heat content (HHV) – minimum value. Annual rate = 600 hr / yr, used as backup fuel.		

E. SEGMENT (PROCESS/FUEL) INFORMATION
(All Emissions Units)**Segment Description and Rate:** Segment 3 of 3

1. Segment Description (Process/Fuel Type) (limit to 500 characters): Process Weight		
2. Source Classification Code (SCC):		3. SCC Units: Tons of Pressed Peel Processed
4. Maximum Hourly Rate: 50	5. Maximum Annual Rate: 438,000	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment (limit to 200 characters):		

Segment Description and Rate: Segment of

1. Segment Description (Process/Fuel Type) (limit to 500 characters):		
2. Source Classification Code (SCC):		3. SCC Units:
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	13. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment (limit to 200 characters):		

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

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
PM	002		EL
PM₁₀	002		EL

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

Potential/Fugitive Emissions

1. Pollutant Emitted: PM	2. Total Percent Efficiency of Control: 90 %
3. Potential Emissions: 32.4 lb/hour 141.8 tons/year	4. Synthetically Limited? []
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 _____ to _____ tons/year	
6. Emission Factor: Process Weight Rate Reference: Rule	7. Emissions Method Code: 0
8. Calculation of Emissions (limit to 600 characters): $\text{lb/hr} = 17.31 \times (50 \text{ tons / hour})^{0.16} = 32.4$ $\text{TPY} = 32.4 \text{ lb/hr} \times 8,760 \text{ hr / yr} \times 1 \text{ ton / 2,000 lb} = 141.8$	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): Rule 62-296.320(4)(a)2., F.A.C. Emission (lb/hr) = $17.31 \times (P)^{0.16}$, where P = process rate (TPH). Control efficiency – 60 to 90%	

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: RULE	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units:	4. Equivalent Allowable Emissions: 32.4 lb/hour 141.8 tons/year
5. Method of Compliance (limit to 60 characters): Annual Compliance Test, EPA Method 5	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): Rule 62-296.320(4)(a)2., F.A.C.	

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

Potential/Fugitive Emissions

1. Pollutant Emitted: PM₁₀	2. Total Percent Efficiency of Control: 90 %
3. Potential Emissions: 32.4 lb/hour 141.8 tons/year	4. Synthetically Limited? <input type="checkbox"/>
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 to tons/year	
6. Emission Factor: Process Weight Rate Reference: Rule	7. Emissions Method Code: 0
8. Calculation of Emissions (limit to 600 characters): $\text{lb/hr} = 17.31 \times (50 \text{ tons / hour})^{0.16} = 32.4$ $\text{TPY} = 32.4 \text{ lb/hr} \times 8,760 \text{ hr / yr} \times 1 \text{ ton / 2,000 lb} = 141.8$	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): Rule 62-296.320(4)(a)2., F.A.C. Emission (lb/hr) = 17.31 x (P)^{0.16}, where P = process rate (TPH). Control efficiency – 60 to 90%	

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: RULE	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units:	4. Equivalent Allowable Emissions: 32.4 lb/hour 141.8 tons/year
5. Method of Compliance (limit to 60 characters): Annual Compliance Test, EPA Method 5	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): Rule 62-296.320(4)(a)2., F.A.C.	

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: VE20	2. Basis for Allowable Opacity: <input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other
3. Requested Allowable Opacity: Normal Conditions: 20 % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance: Annual VE Test EPA Method 9	
5. Visible Emissions Comment (limit to 200 characters): Rule 62-296.320(4)(b), F.A.C.	

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):	

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

Visible Emissions Limitation: Visible Emissions Limitation 2 of 2

1. Visible Emissions Subtype: VE99	2. Basis for Allowable Opacity: [X] Rule [] Other
3. Requested Allowable Opacity: Normal Conditions: % Exceptional Conditions: 100 % Maximum Period of Excess Opacity Allowed: 60 min/hour	
4. Method of Compliance: Best Operational Practices	
5. Visible Emissions Comment (limit to 200 characters): Rule 62-210.700(1), F.A.C. allows excess emissions for 2 hr / 24 hr during startup, shutdown, and/or malfunction.	

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:	
5. Installation Date:	Serial Number: 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 [X] Attached, Document ID: <u>Part II</u> [] 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

PART II

SUPPORTING INFORMATION

TABLE OF CONTENTS

<u>SECTION</u>	<u>PAGE</u>
1.0 INTRODUCTION	1
1.1 EXISTING FACILITY	1
1.2 CITRUS PEEL DRYERS AND WASTE HEAT EVAPORATORS.....	1
1.3 APPLICABLE REQUIREMENTS	2

LIST OF TABLES

Table 1	VOC Emissions for Dryers Nos. 1, 2 and 3 Tropicana Products, Inc.
---------	---

LIST OF FIGURES

Figure 1	Tropicana Products, Inc. Bradenton Feedmill Current Process Flow
Figure 2	Tropicana Products, Inc. Bradenton Feedmill Proposed Process Flow

LIST OF ATTACHMENTS

ATTACHMENT A	TITLE V PERMIT CONDITIONS FOR CITRUS PEEL DRYERS NUMBERS 1, 2 AND 3
--------------	--

1.0 INTRODUCTION

Tropicana Products, Inc. is proposing to add a 120,000-lb/hr waste heat evaporator (WHE) to the existing Bradenton Citrus Processing Plant. The WHE will increase the evaporative capacity of the existing three WHEs that are used for the recovery of citrus oil (i.e., d'limonene). The three existing citrus peel dryers have associated WHEs to evaporate 100,000 lb/hr, 50,000 lb/hr and 50,000 lb/hr, respectively. The added WHE evaporator will be connected to Citrus Peel Dryer No. 3 and the two existing 50,000 lb/hr WHEs will be combined to form a single 100,000 lb/hr WHE serving Citrus Dryer No. 2. Attachment A presents the existing Title V permit conditions for the citrus peel dryers.

The project will result in a net decrease in emissions of volatile organic compounds (VOCs). In addition, the WHEs act as a medium efficiency wet scrubber that reduce particulate matter emissions.

1.1 EXISTING FACILITY

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

The plant contains three citrus feed mills, four citrus pellet mills (including two pellet coolers and associated pellet, bulk cooling reels, and Ross coolers), one glass plant (one glass plant was closed in 2000), cogeneration facility [including combustion turbine, HRSG, duct burner, auxiliary boiler, sanitary process steam boiler (used to produce 5-fold citrus oil)], and a wastewater treatment system (including a package steam boiler and an anaerobic reactor with a biogas flare).

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

1.2 CITRUS PEEL DRYERS AND WASTE HEAT EVAPORATORS

Figure 1 presents a flow diagram of the current feedmill process. The three citrus peel dryers (Citrus Peel Dryers No. 1, No. 2 and No. 3) are connected to WHEs with evaporative capacities of 100,000 lb/hr, 50,000 lb/hr and 50,000 lb/hr. Together these WHEs provide the 60,000-lb/hr evaporative

capacity required for each of the three dryers. However, the configuration does not provide the optimum evaporative capacity desired to recover citrus oil from the three existing citrus peel dryers. Figure 2 presents a flow diagram of the proposed future configuration of citrus feedmill operation. The project will consist of installing an existing 120,000 lb/hr WHE obtained from Florida Global and connecting this WHE to Citrus Peel Dryer No. 3. The existing two 50,000 lb/hr WHEs will be combined into a single 100,000 lb/hr WHE to serve Citrus Dryer No. 2. The existing 100,000 lb/hr WHE will only serve Citrus Dryer No. 1. The controls for the WHEs will be automated to better control the process. The additional WHE will not change the existing capacity of the citrus peel dryers or the amount of citrus peel that can be currently processed.

The addition of the WHE will result in a net reduction of VOCs from the citrus peel drying process. Table 1 presents the VOC emissions for the years 1999, 2000 and 2001. The average VOC emissions for 2000 and 2001 are about 1,700 tons/year. The citrus oil (i.e., d'limonene) recovery with the additional WHE is projected to increase by about 450 tons/year, which will reduce the VOC emissions approximately proportionally for each citrus peel dryer. Table 1 presents the projected reduction in VOC emissions from the facility.

1.3 APPLICABLE REQUIREMENTS

A modification is defined in Rule 62-210.200 Florida Administrative Code (F.A.C.) as any physical change in, or a change in the method of operation of, or addition to a facility which would result in an increase in the actual emissions of any air pollutant subject to regulation under the Clean Air Act. A physical change or a change in the method of operation does not include routine replacement, repair or replacement of components part of an emission unit. A modification to a major source of air pollution, such as the Tropicana Bradenton Citrus Processing Plant, may be subject to review under the Department's PSD rules codified in Rule 62-212.400 F.A.C.

As shown in Table 1, the proposed project will decrease VOC emissions from the facility. Therefore, PSD review is not applicable. A construction permit is being submitted to provide information to the Department for the addition of the WHE and change in configuration of the WHEs at the Bradenton facility.

Table 1. VOC Emissions from Dryers 1, 2 and 3
Tropicana Products, Inc. Bradenton

	VOC Emissions (TPY)			VOC Emissions 2000/2001 Average (TPY)	VOC Emissions Projected Average (TPY)	VOC Emissions Projected Average (TPY)
	1999	2000	2001			
Dryer #1	491.0	548.0	640.3	594.1	436.9	-157
Dryer #2	407.0	517.9	596.9	557.4	409.9	-148
Dryer #3	425.0	497.3	599.8	548.6	403.4	-145
Total	1,323.0	1,563.2	1,837.0	1,700.1	1,250.1	-450

Note: TPY = tons per year.

Source: 1999, 2000 and 2001 Annual Operating Reports for Air Pollutant
Emitting Facility.

Figure 1. Tropicana Products, Inc. Bradenton Feedmill Current Process Flow

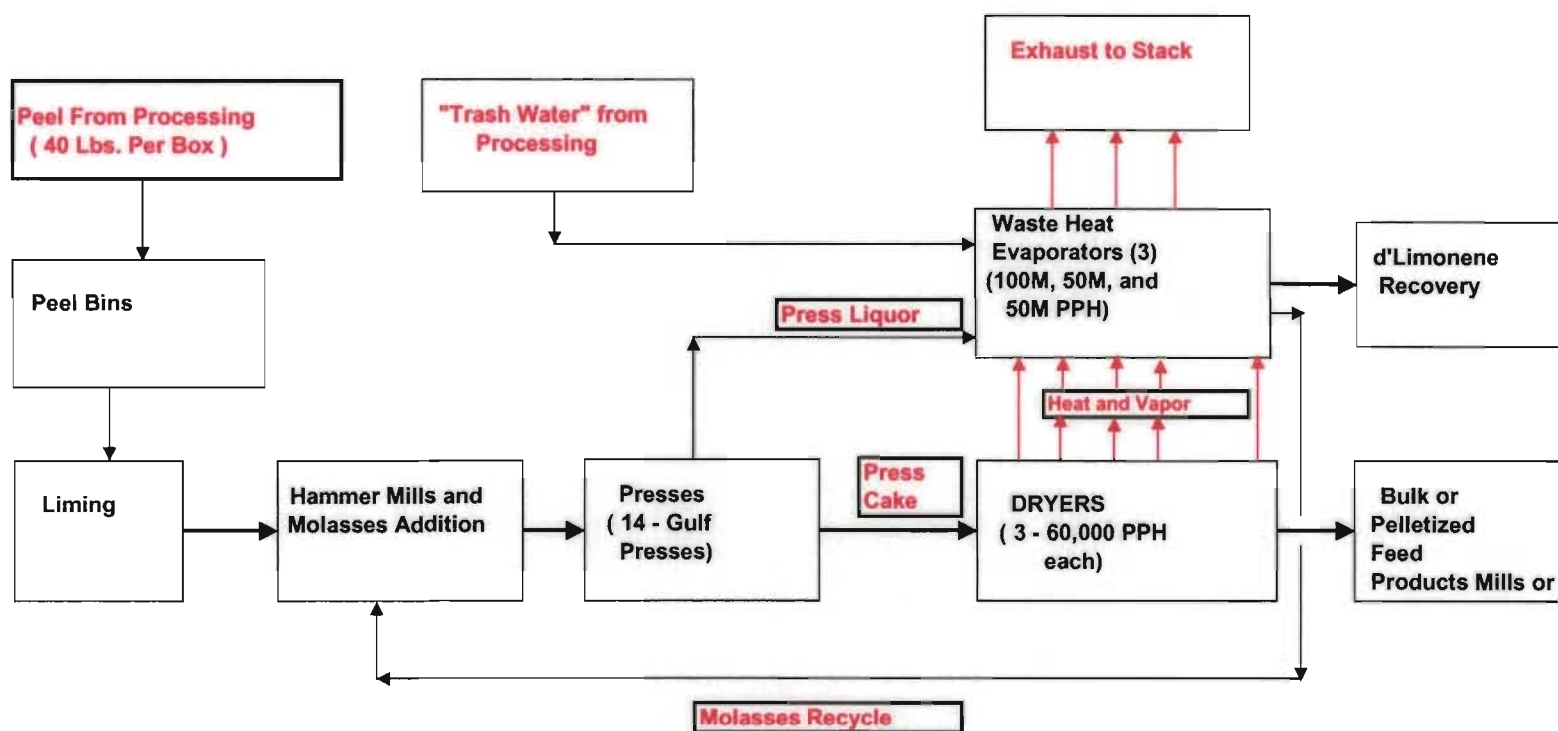
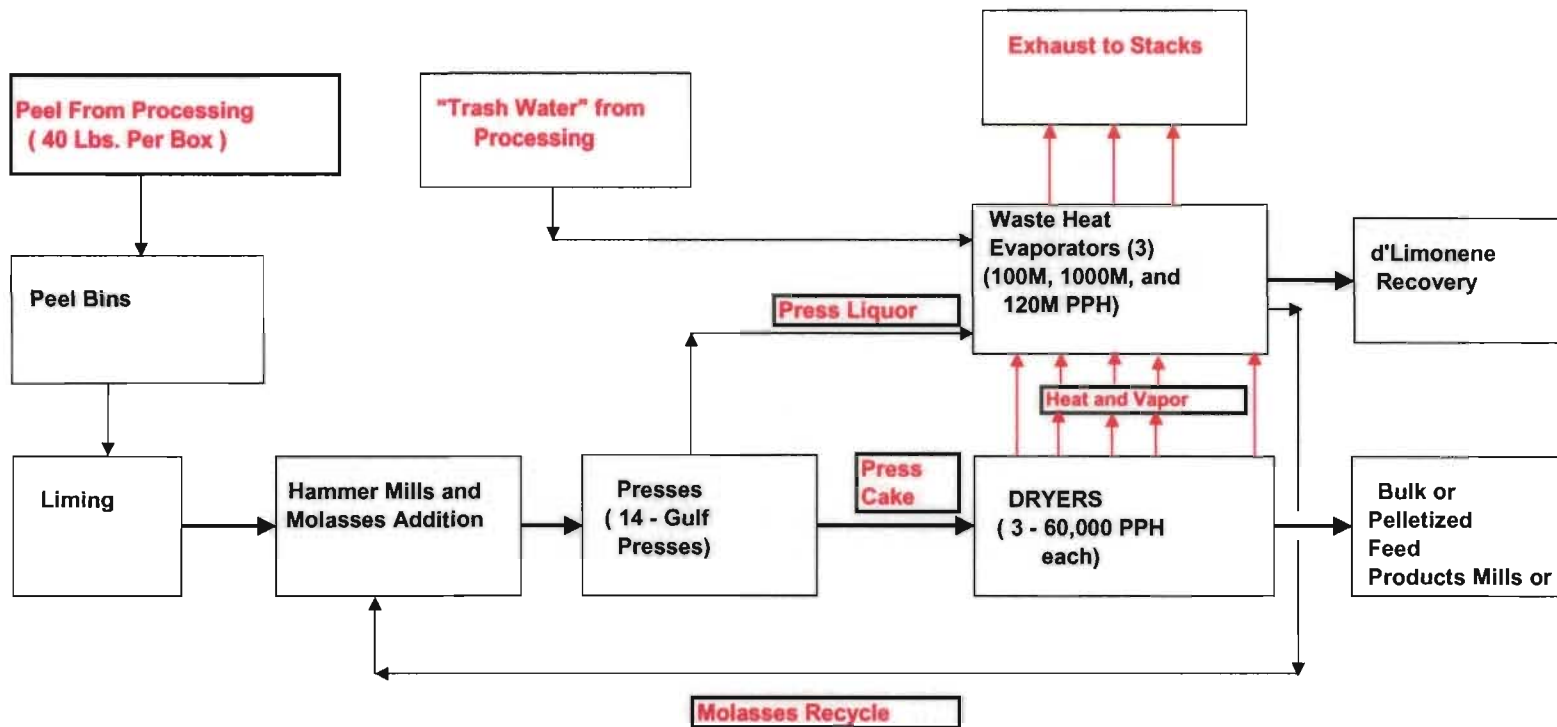


Figure 2. Tropicana Products, Inc. Bradenton Feedmill Proposed Process Flow



ATTACHMENT A

TITLE V PERMIT CONDITIONS

FOR

CITRUS PEEL DRYERS NUMBERS 1, 2 AND 3

Section III. Emissions Unit(s) and Conditions.

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

E.U.

<u>ID No.</u>	<u>Brief Description</u>
---------------	--------------------------

-001	Citrus Peel Dryer No. 1 with waste heat evaporator
-002	Citrus Peel Dryer No. 2 with waste heat evaporator
-003	Citrus Peel Dryer No. 3 with waste heat evaporator

Citrus Peel Dryer Nos. 1, 2, and 3 each include a citrus pulp dehydrator associated with a waste heat evaporator (WHE). Each dehydrator is designed to evaporate a maximum of 60,000 pounds per hour of water, fired with natural gas, with No. 2 fuel oil with a maximum sulfur content of 0.5% as a backup fuel, at a maximum design heat input rate of 84 million (MM) BTU per hour. Dehydrator No. 1 is associated with a WHE which is designed to evaporate 100,000 pounds per hour of water from the press liquor process stream. Dehydrators Nos. 2 and 3 are associated with WHEs designed to evaporate 50,000 pounds per hour of water from the press liquor. Each dehydrator processes a maximum of about 100,000 pounds per hour of pressed peel containing about 70% moisture and Brix citrus molasses. Each evaporator processes a maximum of about 66,000 pounds per hour of 9 degrees Brix press liquor and converts it to about 29,700 pounds per hour at about 20 degrees Brix. Each dehydrator and associated WHE produce a maximum of 40,000 pounds per hour of dried peel at approximately 9% moisture.

{Permitting note(s): These emissions units are regulated under 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

A.1. Capacity.

- The maximum process input rate to each peel dryer shall not exceed 50.0 tons per hour of pressed wet citrus peel.
- The maximum heat input to the dehydrator shall not exceed 84 MMBtu per hour when firing natural gas.

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

A.2. Methods of Operation - (i.e., Fuels).

Each dehydrator shall be fired with natural gas as the primary fuel with No. 2 fuel oil as a backup fuel to be used no more than 600 hours per 12 consecutive month period. The No. 2 fuel oil shall contain no more than 0.5% sulfur, by weight.

[Rules 62-210.200(PTE), 62-4.160(2), and 62-213.440(1), F.A.C.]

Emission Limitations and Standards

A.3. Particulate matter emissions shall not exceed any of the following limits:

Emissions Unit	Maximum Allowable Emissions	
	Pounds per Hour ¹	Tons per Year
001, Citrus Peel Dryer No. 1	32.4	139.41
002, Citrus Peel Dryer No. 2	32.4	139.41
003, Citrus Peel Dryer No. 3	32.4	138.1

¹Based upon the Process Weight Table equations below for the maximum permitted process rate of 50 tons per hour for each dryer.

Where: E = Emission limit in pounds/hour, and

P = Process weight rate (input process rate to the dehydrator) in tons per hour,

(i) $E = (3.59) P^{0.62}$, where P is less than or equal to 30 tons/hour, or

(ii) $E = (17.31) P^{0.16}$, where P is greater than 30 tons/hour.

[Rule 62-296.320(4)(a), F.A.C.; Air Operation Permit 0810007-002-AO]

A.4. Visible emissions from these emission units shall not be equal to or greater than 20% opacity.

[Rule 62-296.320(4)(b)(1), F.A.C.]

Test Methods and Procedures

A.5. The permittee shall test for particulate matter and visible emissions from the Citrus Peel Dryer Nos. 1, 2 and 3 on, or during the 60 day period prior to March 11.

{Permitting Note: The compliance test due date is for planning purposes only. Rule 62-297.310(7)(a)4, F.A.C. allows the permittee to conduct a formal compliance test any time during the federal fiscal year (October 1 – September 30).}

Emission testing shall be conducted while operating each dryer within 90 - 100% of the maximum process input rate of 50 tons/hr., when practical. If it is not practical to test at the maximum process input rate, then the source may be tested at a lower rate. A compliance test submitted at a rate less than 90% of the maximum permitted rate shown above will automatically constitute an amended permit at 110% of the test rate. Once the unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity*.

* Clarification: When a unit is limited to an operating rate at 110% of the tested rate, the permittee may provide notice of an additional test (as in notification condition 16). That notice may specify a 15 day period when the unit will be allowed to operate at higher capacities for the purpose of additional testing. For example, the first five days of the 15 day period may be used to bring the unit up to a higher production level; the next five days may be used for the tests themselves. After the final test, the unit must be returned to the capacity which existed prior to the most recent test. Upon written approval by the Department of the most recent test results, the unit may then operate at 110% of the most recent test load, not to exceed the maximum permitted rate.

The test results shall be submitted to the Air Compliance Section of this office within 45 days of testing. Acceptance of the test by this office will automatically constitute an amended permit at the higher tested rate plus 10%, but in no case shall the maximum permitted rate shown above be exceeded. Failure to submit the following records with the test report may invalidate the test and fail to provide reasonable assurance of compliance:

- The pressed wet peel input rate to the dryer during the test.
- The natural gas or fuel oil usage rate to the dryer during the test.
- If applicable, documentation of the fuel oil's type and sulfur content that was used during the test.
- The WHEs operating parameters, which would indicate proper operation of the water spray nozzles, shall be recorded during the particulate emission compliance test. These WHE operating parameters could include water spray rate (gallons/minute), water feed pump/spray operating pressure, or other parameters that are used to control and monitor the operation of the WHE. The permittee shall provide to the Department a monitoring plan of the proposed operating parameters to be used to monitor proper operation of the WHEs within 60 days of the effective date of this permit. (Note: The parameter(s) and their operating levels during the compliance test will be used to provide reasonable assurance on an ongoing basis that the unit is being operated normally and in compliance with the standards - See Condition No. A.11.) At least one reading shall be taken and recorded during each run of the particulate emission compliance test and the readings shall be included with any peel dryer test report.

[Rules 62-297.310(2) and 62-4.070(3), F.A.C.]

A.6. Compliance with the emission limitations of Conditions A.3 and A.4 shall be determined using EPA Methods 1, 2, 3, 4, 5, and 9 contained in 40 CFR 60, Appendix A and adopted by reference in Chapter 62-297, F.A.C. The EPA Method 9 test shall be conducted by a certified observer and be a minimum of sixty (60) minutes in duration. The minimum requirements for stationary point source emission test procedures and reporting shall be in accordance with 40 CFR 60 Appendix A and Chapter 62-297, F.A.C. [Chapter 62-297, F.A.C.]

A.7. Compliance testing of the dryer/waste heat evaporator shall be conducted when firing No. 2 fuel oil if fuel oil has been used in the dryer for more than 400 hours for the previous 12 months, or if it is expected to be used in the dryer for more than 400 hours during the next 12 months. If the test is conducted while firing natural gas and in the 12 month period following the test No. 2 fuel oil is burned for more than 400 hours, then an additional VE test (while burning No. 2 oil in the dryer) shall be conducted within 30 days of having passed the 400 hour fuel oil burning level. The permittee shall submit a statement of the fuel operating mode (type of fuel and heat input rate) as a part of the compliance test report. Failure to submit the fuel operation mode statement may invalidate the data and fail to provide reasonable assurance of compliance.
[Rule 62-4.070(3), F.A.C.]

A.8. If particulate and visible emission testing is conducted while firing No. 2 fuel oil, compliance with the No. 2 oil sulfur content limitation in Condition A.2 shall be demonstrated during the test through submission of either of the following with the test report:

- a. Results of fuel oil analysis from the fuel oil vendor showing the sulfur content representative of the fuel fired during the compliance test;
- b. Results of a fuel oil analysis showing the sulfur content for a fuel oil sample taken during the compliance test.

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

Monitoring, Recordkeeping and Reporting Requirements

A.9. In order to document compliance with the Conditions A.1 and A.2, the permittee shall maintain a record of fuel oil firing in each dehydrator. The records shall include the following for each period fuel oil is fired:

- a. date;
- b. beginning and end time of fuel oil firing;
- c. calculated duration of fuel oil firing (hours) for the above period; and
- d. accumulated hours of fuel oil firing for the most recent 12 month period (hours/12 consecutive month period).

In addition to the above operation records the permittee shall maintain records of the sulfur content of all fuel oil delivered for use in each dehydrator. These records may be based on vendor supplied analysis data or upon analysis of samples taken on site at the plant. These records shall be recorded in a permanent form suitable for inspection by the Department upon request.

[Rule 62-213.440(1), F.A.C.]

A.10. In order to document compliance with Condition A.1, the permittee shall maintain monthly records of the weight of wet peel input processed and/or dried peel

produced for each dryer. These records shall be recorded in a permanent form suitable for inspection by the Department upon request.
[Rule 62-4.070(3), F.A.C.]

A.11. Waste Heat Evaporator (WHE) operating parameters shall be maintained at a minimum of 90% of the values measured and recorded during the most recent particulate matter emission compliance test. WHE parameters shall be recorded at least once during each 8-hour shift.
[Rules 62-210.650 and 62-213.440(1), F.A.C.]

SENDER: COMPLETE THIS SECTION

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

1. Article Addressed to:

Mr. Donald Antenore,
Vice President, Mfg.
P.O. Box 338
Bradenton, Florida 34206

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) Danny Andrews B. Date of Delivery 10-16-02
C. Signature Danny Andrews ☐ Agent
☒ Addressee
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

2. Article Number (Copy from service label)

7000 0600 0021 6524 2878

PS Form 3811, July 1999

Domestic Return Receipt

102595-00-M-0952

U.S. Postal Service**CERTIFIED MAIL RECEIPT**

(Domestic Mail Only; No Insurance Coverage Provided)

Article Sent To:

Mr. Donald Antenore

Postage \$

Certified Fee

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

Total Postage & Fees \$

Postmark
Here

Name (Please Print Clearly) (to be completed by mailer)

Mr. Donald Antenore

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

P.O. Box 338

City, State, ZIP+4

Bradenton, Florida 34206

PS Form 3800, July 1999

See Reverse for Instructions

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

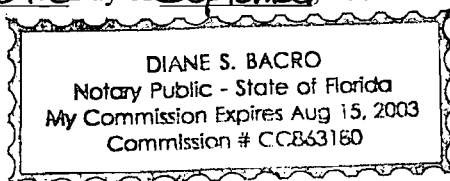
STATE OF FLORIDA
COUNTY OF MANATEE;

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, **9/17,'02**

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

Sandy Riley
(Signature of Affiant)

Sworn to and subscribed before me this
18th Day of September, 2002



Diane S. Bacro
SEAL & Notary Public

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

PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT

STATE OF FLORIDA
DEPARTMENT OF
ENVIRONMENTAL
PROTECTION
DEP FILE NO.
0810007-010-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 Ave., Bradenton, Manatee County. The applicant's mailing address: **P.O. Box 338, Bradenton, Florida 34206.** The permit is for the installation of waste heat evaporators. The new waste heat evaporator is available from another citrus processing plant. Currently there are three waste heat evaporators associated with the three existing citrus peel dryers. Citrus Peel Dryer No. 1 has a waste heat evaporator rated at 100,000 pounds per hour and Citrus Peel Dryers Nos. 2 and 3 each have 50,000 pounds per hour waste heat evaporators. The waste heat evaporator from Citrus Peel Dryer No. 3 will be connected to Citrus Peel Dryer No. 2, giving it an evaporative capacity of 100,000 pounds per hour. The new 120,000 pounds per hour waste heat evaporator will be installed on Citrus Peel Dryer No. 3. No change will be made to Citrus Peel Dryer No. 1.

Total emissions of pollutants from the installation of the waste heat evaporators authorized by this permit will not exceed the following approximate annual emission rates in tons per year: PM, 0.0, VOC, 0.0.

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 pro-

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

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

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

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

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

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

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

posed permit and project, Edward J. Svec, at the Bureau of Air Regulation in Tallahassee, Florida, or Call 850-488-0114, for additional information. Written comments directed to the Department's reviewing engineer should be sent to the following mailing address: Dept. of Environmental Protection, Bureau of Air Regulation, Mail Station #5505, Tallahassee, Florida 32399-2400. 9/17/02

require, if applicable, another Public Notice. The Department will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to sections 120.569 and 120.57 F.S., before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below. Mediation is not available in this proceeding. A person whose substantial interests are

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

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

- (a) The name & address of each agency affected and each agency's file or identification number, if known;
- (b) The name, address and telephone number of the petitioner, the name, address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination;
- (c) A statement of how and when petitioner received notice of the agency's action or pro-

BUREAU OF AIR REGULATION

SEP 26 2002

RECEIVED

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.

Article Addressed to:

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

COMPLETE THIS SECTION ON DELIVERY

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

D. F. Allutto

C. Signature

X

EVAL F. ALLUTTO

☒ Agent☒ AddresseeD. Is delivery address different from item 1? ☐ YesIf 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

2. Article Number (Copy from service label)

7000 0600 0021 6524 3158

PS Form 3811, July 1999

Domestic Return Receipt

102595-00-M-0952

U.S. Postal Service**CERTIFIED MAIL RECEIPT**

(Domestic Mail Only; No Insurance Coverage Provided)

Article Sent To:

Mr. Donald Antenore

Postage \$

Certified Fee

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

Total Postage & Fees \$

Postmark
Here

Name (Please Print Clearly) (to be completed by mailer)

Mr. Donald Antenore

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

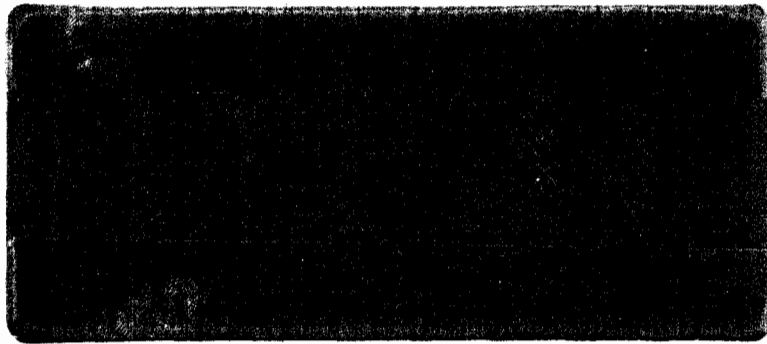
P.O. Box 338

City, State, ZIP+4

Bradenton, Florida 34206

PS Form 3800, July 1999

See Reverse for Instructions



RECEIVED

AUG 01 2002

BUREAU OF AIR REGULATION

**APPLICATION FOR AIR PERMIT
WASTE HEAT EVAPORATORS
FOR TROPICANA PRODUCTS, INC.
BRADENTON CITRUS PROCESSING FACILITY**

Prepared For:

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

Prepared By:

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

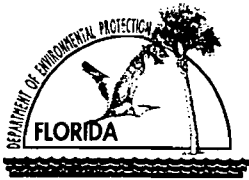
**July 2002
0237563**

DISTRIBUTION:

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

PART I

**APPLICATION FOR AIR PERMIT
LONG FORM**



Department of Environmental Protection

Division of Air Resources Management

APPLICATION FOR AIR PERMIT - TITLE V SOURCE

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

I. APPLICATION INFORMATION

Identification of Facility

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

Application Contact

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

Application Processing Information (DEP Use)

1. Date of Receipt of Application:	8-1-02
2. Permit Number:	0810007-010-A C
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: _____

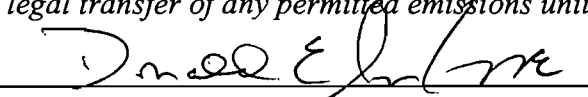
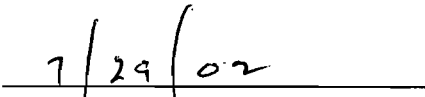
Air Construction Permit Application

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

RECEIVED
AUG 01 2002
BUREAU OF AIR REGULATION

1. Name and Title of Owner/Authorized Representative or Responsible Official: Donald Antenore, Vice President, Manufacturing
2. Owner/Authorized Representative or Responsible Official Mailing Address: Organization/Firm: Tropicana Products, Inc. Street Address: P.O. Box 338 City: Bradenton State: FL Zip Code: 34206
3. Owner/Authorized Representative or Responsible Official Telephone Numbers: Telephone: (941) 742 - 3349 Fax: (941) 749 - 2049
4. Owner/Authorized Representative or Responsible Official Statement: <i>I, the undersigned, am the owner or authorized representative*(check here [X], if so) or the responsible official (check here [], if so) of the Title V source addressed in this application, whichever is applicable. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof. I understand that a permit, if granted by the Department, cannot be transferred without authorization from the Department, and I will promptly notify the Department upon sale or legal transfer of any permitted emissions unit.</i>  Signature  Date

* Attach letter of authorization if not currently on file.

Professional Engineer Certification

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

*Board of Professional Engineers Certificate 00001670

Gary M. Rodkin
President



DESIGNATION OF DOCUMENT SIGNATORY


I, Gary M. Rodkin, hereby certify that I am the Executive Vice President of Tropicana Products, Inc., ("Tropicana") and as such I am authorized to designate employees to prepare and sign documents and to certify on behalf of said company the accuracy and completeness of information in such documents.

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

This designation is effective until revoked in writing.

Designated Signatory

Donald E. Antenore
Vice President, Manufacturing
1001 13th Avenue East
Bradenton, FL 34208



Gary M. Rodkin
Executive Vice President

Dated: 8/1/98

4. Professional Engineer Statement:

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

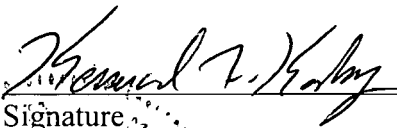
(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this Application for Air Permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions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

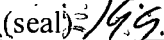
If the purpose of this application is to obtain a Title V source air operation permit (check here [], if so), I further certify that each emissions unit described in this Application for Air Permit, when properly operated and maintained, will comply with the applicable requirements identified in this 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

7/16/02
Date

(seal) 

* Attach any exception to certification statement.

Scope of Application

Emissions Unit ID	Description of Emissions Unit	Permit Type	Processing Fee
001	Citrus Peel Dryer No. 1 with WHE		
002	Citrus Peel Dryer No. 2 with WHE		
003	Citrus Peel Dryer No. 3 with WHE		

Application Processing Fee

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

Construction/Modification Information

1. Description of Proposed Project or Alterations:

Citrus Peel Dryers Nos. 1, 2, and 3 have associated waste heat evaporators (WHE) designed to evaporate 100,000 lb/hr, 50,000 lb/hr, and 50,000 lb/hr respectively. The proposed project involves adding a 120,000 lb/hr WHE for Citrus Peel Dryer No. 3 and combining the 50,000 lb/hr WHE's into one 100,000 lb/hr WHE for Citrus Peel Dryer No. 2.

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

3. Projected Date of Completion of Construction: **1 Sept 2003**

Application Comment

There is no air emissions increase associated with the project. The additional evaporation will recover about 450 tons per year of VOCs in the form of citrus oil (i.e., d'limonene). The Project will also reduce particulate matter emissions due to the increased scrubbing capacity.

See Attachment Part II.

II. FACILITY INFORMATION

A. GENERAL FACILITY INFORMATION

Facility Location and Type

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

Facility Contact

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

Check all that apply:

List of Applicable Regulations

DEP Form No. 62-210.900(1) - Form
Effective: 2/11/99

B. FACILITY POLLUTANTS

List of Pollutants Emitted

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

Supplemental Requirements

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

Additional Supplemental Requirements for Title V Air Operation Permit Applications

8. List of Proposed Insignificant Activities: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
9. List of Equipment/Activities Regulated under Title VI: <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Equipment/Activities On site but Not Required to be Individually Listed <input checked="" type="checkbox"/> Not Applicable
10. Alternative Methods of Operation: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
11. Alternative Modes of Operation (Emissions Trading): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
12. Identification of Additional Applicable Requirements: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
13. Risk Management Plan Verification: <input type="checkbox"/> Plan previously submitted to Chemical Emergency Preparedness and Prevention Office (CEPPO). Verification of submittal attached (Document ID: _____) or previously submitted to DEP (Date and DEP Office: _____) <input type="checkbox"/> Plan to be submitted to CEPPO (Date required: _____) <input checked="" type="checkbox"/> Not Applicable
14. Compliance Report and Plan: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
15. Compliance Certification (Hard-copy Required): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

III. EMISSIONS UNIT INFORMATION

A separate Emissions Unit Information Section (including subsections A through J as required) must be completed for each emissions unit addressed in this Application for Air Permit. If submitting the application form in hard copy, indicate, in the space provided at the top of each page, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application.

A. GENERAL EMISSIONS UNIT INFORMATION
(All Emissions Units)

Emissions Unit Description and Status

1. Type of Emissions Unit Addressed in This Section: (Check one)			
<input checked="" type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).			
<input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.			
<input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.			
2. Regulated or Unregulated Emissions Unit? (Check one)			
<input checked="" type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.			
<input type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.			
3. Description of Emissions Unit Addressed in This Section (limit to 60 characters):			
Citrus Peel Dryer No. 1 with Waste Heat Evaporator			
4. Emissions Unit Identification Number:		<input type="checkbox"/> No ID <input type="checkbox"/> ID Unknown	
ID: 001			
5. Emissions Unit Status Code:	6. Initial Startup Date:	7. Emissions Unit Major Group SIC Code:	8. Acid Rain Unit?
A		20	<input type="checkbox"/>
9. Emissions Unit Comment: (Limit to 500 Characters)			
Feed Mill No. 1 includes a citrus pulp dehydrator designed to evaporate 60,000 lb/hr of water from a max. throughput of 50 TPH of pressed peel, producing 40,000 lb/hr of dried peel. It is fired with natural gas with fuel oil backup; Max. heat input, 84 MMBtu/hr. The associated waste heat evaporator is designed to evaporate 100,000 lb/hr of water from pressed liquor, producing citrus molasses. See Attachment Part II.			

Emissions Unit Control Equipment

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

Wet Scrubber, medium efficiency for PM control2. Control Device or Method Code(s): **2****Emissions Unit Details**

1. Package Unit:

Manufacturer:

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:	84	mmBtu/hr
2. Maximum Incineration Rate:	lb/hr	tons/day
3. Maximum Process or Throughput Rate:	100,000	lb/hr*
4. Maximum Production Rate:	40,000	lb/hr**
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):		
* pressed wet peel ** dried peel		

C. EMISSIONS UNIT REGULATIONS (Regulated Emissions Units Only)

List of Applicable Regulations

The proposed addition of the WHE does not change the applicable regulations for Citrus Peel Dryers Nos. 1, 2, and 3 as identified in the current Title V Permit No. 0810007-003-AV.

[illegible]

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? EU1		2. Emission Point Type Code: 3	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point): Gases from the dehydrator pass through the waste heat evaporator and exhaust from evaporator stack and relief stack.			
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common: EU2 and EU3			
5. Discharge Type Code: V	6. Stack Height: 95 feet	7. Exit Diameter: 3.2 feet	
8. Exit Temperature: 100 °F	9. Actual Volumetric Flow Rate: 17,000 acfm	10. Water Vapor: %	
11. Maximum Dry Standard Flow Rate: dscfm		12. Nonstack Emission Point Height: feet	
13. Emission Point UTM Coordinates: Zone: East (km): North (km):			
14. Emission Point Comment (limit to 200 characters): Exit diameter = 3.17 (rounded to 3.2).			

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

Segment Description and Rate: Segment 1 of 3

1. Segment Description (Process/Fuel Type) (limit to 500 characters): Industrial Processes – Food and Agriculture – Fuel Fired Equipment – Natural Gas: Process Heaters		
2. Source Classification Code (SCC): 3-02-900-03		3. SCC Units: Million Cubic Feet Burned
4. Maximum Hourly Rate: 0.088	5. Maximum Annual Rate: 775	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit: 950
10. Segment Comment (limit to 200 characters): Maximum hourly rate = 0.0884 (rounded to 0.088). Maximum annual rate = 774.6 (rounded to 775) based on minimum heat content. Maximum sulfur content – 1 gr / 100 cf		

Segment Description and Rate: Segment 2 of 3

1. Segment Description (Process/Fuel Type) (limit to 500 characters): Industrial Processes – Food and Agriculture – Fuel Fired Equipment – Residual Oil: Process Heaters		
2. Source Classification Code (SCC): 3-02-900-02		3. SCC Units: Thousand gallons burned
4. Maximum Hourly Rate: 0.56	5. Maximum Annual Rate: 336	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur: 1.0	8. Maximum % Ash: 0.1	9. Million Btu per SCC Unit: 150
10. Segment Comment (limit to 200 characters): Heat content (HHV) – minimum value. Annual rate = 600 hr / yr, used as backup fuel.		

E. SEGMENT (PROCESS/FUEL) INFORMATION
(All Emissions Units)**Segment Description and Rate:** Segment 3 of 3

1. Segment Description (Process/Fuel Type) (limit to 500 characters): Process Weight		
2. Source Classification Code (SCC):		3. SCC Units: Tons of Pressed Peel Processed
4. Maximum Hourly Rate: 50	5. Maximum Annual Rate: 438,000	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment (limit to 200 characters):		

Segment Description and Rate: Segment of

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

F. EMISSIONS UNIT POLLUTANTS
(All Emissions Units)

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
PM	002		EL
PM ₁₀	002		EL

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

Potential/Fugitive Emissions

1. Pollutant Emitted: PM	2. Total Percent Efficiency of Control: 90 %
3. Potential Emissions: 32.4 lb/hour 141.8 tons/year	4. Synthetically Limited? <input type="checkbox"/>
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 _____ to _____ tons/year	
6. Emission Factor: Process Weight Rate Reference: Rule	7. Emissions Method Code: 0
8. Calculation of Emissions (limit to 600 characters): $\text{lb/hr} = 17.31 \times (50 \text{ tons / hour})^{0.16} = 32.4$ $\text{TPY} = 32.4 \text{ lb/hr} \times 8,760 \text{ hr / yr} \times 1 \text{ ton / 2,000 lb} = 141.8$	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): Rule 62-296.320(4)(a)2., F.A.C. Emission (lb/hr) = 17.31 x (P)^{0.16}, where P = process rate (TPH). Control efficiency – 60 to 90%	

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: RULE	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units:	4. Equivalent Allowable Emissions: 32.4 lb/hour 141.8 tons/year
5. Method of Compliance (limit to 60 characters): Annual Compliance Test, EPA Method 5	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): Rule 62-296.320(4)(a)2., F.A.C.	

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

Potential/Fugitive Emissions

1. Pollutant Emitted: PM₁₀	2. Total Percent Efficiency of Control: 90 %
3. Potential Emissions: 32.4 lb/hour 141.8 tons/year	4. Synthetically Limited? <input type="checkbox"/>
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 _____ to _____ tons/year	
6. Emission Factor: Process Weight Rate Reference: Rule	7. Emissions Method Code: 0
8. Calculation of Emissions (limit to 600 characters): $\text{lb/hr} = 17.31 \times (50 \text{ tons / hour})^{0.16} = 32.4$ $\text{TPY} = 32.4 \text{ lb/hr} \times 8,760 \text{ hr / yr} \times 1 \text{ ton / 2,000 lb} = 141.8$	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): Rule 62-296.320(4)(a)2., F.A.C. Emission (lb/hr) = 17.31 x (P)^{0.16}, where P = process rate (TPH). Control efficiency – 60 to 90%	

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: RULE	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units:	4. Equivalent Allowable Emissions: 32.4 lb/hour 141.8 tons/year
5. Method of Compliance (limit to 60 characters): Annual Compliance Test, EPA Method 5	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): Rule 62-296.320(4)(a)2., F.A.C.	

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: VE20	2. Basis for Allowable Opacity: <input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other
3. Requested Allowable Opacity: Normal Conditions: 20 % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance: Annual VE Test EPA Method 9	
5. Visible Emissions Comment (limit to 200 characters): Rule 62-296.320(4)(b), F.A.C.	

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): 	

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

Visible Emissions Limitation: Visible Emissions Limitation 2 of 2

1. Visible Emissions Subtype: VE99	2. Basis for Allowable Opacity: <input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other
3. Requested Allowable Opacity: Normal Conditions: % Exceptional Conditions: 100 % Maximum Period of Excess Opacity Allowed: 60 min/hour	
4. Method of Compliance: Best Operational Practices	
5. Visible Emissions Comment (limit to 200 characters): Rule 62-210.700(1), F.A.C. allows excess emissions for 2 hr / 24 hr during startup, shutdown, and/or malfunction.	

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 [X] Attached, Document ID: <u>Part II</u> [] 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

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):			
Citrus Peel Dryer No. 2 with Waste Heat Evaporator			
4. Emissions Unit Identification Number:		<input type="checkbox"/> No ID <input type="checkbox"/> ID Unknown	
ID: 002			
5. Emissions Unit Status Code:	6. Initial Startup Date:	7. Emissions Unit Major Group SIC Code:	8. Acid Rain Unit?
A		20	<input type="checkbox"/>
9. Emissions Unit Comment: (Limit to 500 Characters)			
Feed Mill No. 2 includes a citrus pulp dehydrator designed to evaporate 60,000 lb/hr of water from a max. throughput of 50 TPH of pressed peel, producing 40,000 lb/hr of dried peel. It is fired with natural gas with fuel oil backup; Max. heat input, 84 MMBtu/hr. The associated waste heat evaporator will evaporate 100,000 lb/hr of water from pressed liquor producing citrus molasses. See Attachment Part II.			

Emissions Unit Control Equipment

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

Wet Scrubber, medium efficiency for PM control2. Control Device or Method Code(s): **2****Emissions Unit Details**

1. Package Unit:	
Manufacturer:	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:	84	mmBtu/hr
2. Maximum Incineration Rate:	lb/hr	tons/day
3. Maximum Process or Throughput Rate:	100,000	lb/hr*
4. Maximum Production Rate:	40,000	lb/hr**
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):		
* pressed wet peel ** dried peel		

C. EMISSIONS UNIT REGULATIONS (Regulated Emissions Units Only)

List of Applicable Regulations

The proposed addition of the WHE does not change the applicable regulations for Citrus Peel Dryers Nos. 1, 2, and 3 as identified in the current Title V Permit No. 0810007-003-AV.

[illegible]

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? EU2		2. Emission Point Type Code: 3	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point): Gases from the dehydrator pass through the waste heat evaporator and exhaust from the evaporator stack and relief stack.			
5. ID Numbers or Descriptions of Emission Units with this Emission Point in Common: EU2 and EU3			
5. Discharge Type Code: V	6. Stack Height: 95 feet	7. Exit Diameter: 3.2 feet	
8. Exit Temperature: 100 °F	9. Actual Volumetric Flow Rate: 17,000 acfm	10. Water Vapor: %	
11. Maximum Dry Standard Flow Rate: dscfm		12. Nonstack Emission Point Height: feet	
13. Emission Point UTM Coordinates: Zone: East (km): North (km):			
14. Emission Point Comment (limit to 200 characters): Exit diameter = 3.17 (rounded to 3.2).			

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

Segment Description and Rate: Segment 1 of 3

1. Segment Description (Process/Fuel Type) (limit to 500 characters): Industrial Processes – Food and Agriculture – Fuel Fired Equipment – Natural Gas: Process Heaters		
2. Source Classification Code (SCC): 3-02-900-03		3. SCC Units: Million Cubic Feet Burned
4. Maximum Hourly Rate: 0.088	5. Maximum Annual Rate: 775	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit: 950
10. Segment Comment (limit to 200 characters): Maximum hourly rate = 0.0884 (rounded to 0.088). Maximum annual rate = 774.6 (rounded to 775) based on minimum heat content. Maximum sulfur content – 1 gr / 100 cf		

Segment Description and Rate: Segment 2 of 3

1. Segment Description (Process/Fuel Type) (limit to 500 characters): Industrial Processes – Food and Agriculture – Fuel Fired Equipment – Residual Oil: Process Heaters		
2. Source Classification Code (SCC): 3-02-900-02		3. SCC Units: Thousand gallons burned
4. Maximum Hourly Rate: 0.56	5. Maximum Annual Rate: 336	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur: 1.0	10. Maximum % Ash: 0.1	9. Million Btu per SCC Unit: 150
10. Segment Comment (limit to 200 characters): Heat content (HHV) – minimum value. Annual rate = 600 hr / yr, used as backup fuel.		

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

Segment Description and Rate: Segment 3 of 3

1. Segment Description (Process/Fuel Type) (limit to 500 characters): Process Weight		
2. Source Classification Code (SCC):		3. SCC Units: Tons of Pressed Peel Processed
4. Maximum Hourly Rate: 50	5. Maximum Annual Rate: 438,000	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment (limit to 200 characters):		

Segment Description and Rate: Segment _____ of _____

1. Segment Description (Process/Fuel Type) (limit to 500 characters):		
2. Source Classification Code (SCC):		3. SCC Units:
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	11. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment (limit to 200 characters):		

F. EMISSIONS UNIT POLLUTANTS
(All Emissions Units)

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
PM	002		EL
PM ₁₀	002		EL

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

Potential/Fugitive Emissions

1. Pollutant Emitted: PM	2. Total Percent Efficiency of Control: 90 %
3. Potential Emissions: 32.4 lb/hour 141.8 tons/year	4. Synthetically Limited? <input type="checkbox"/>
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 _____ to _____ tons/year	
6. Emission Factor: Process Weight Rate Reference: Rule	7. Emissions Method Code: 0
8. Calculation of Emissions (limit to 600 characters): $\text{lb/hr} = 17.31 \times (50 \text{ tons / hour})^{0.16} = 32.4$ $\text{TPY} = 32.4 \text{ lb/hr} \times 8,760 \text{ hr / yr} \times 1 \text{ ton / 2,000 lb} = 141.8$	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): Rule 62-296.320(4)(a)2., F.A.C. Emission (lb/hr) = $17.31 \times (P)^{0.16}$, where P = process rate (TPH). Control efficiency – 60 to 90%	

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: RULE	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units:	4. Equivalent Allowable Emissions: 32.4 lb/hour 141.8 tons/year
5. Method of Compliance (limit to 60 characters): Annual Compliance Test, EPA Method 5	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): Rule 62-296.320(4)(a)2., F.A.C.	

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

Potential/Fugitive Emissions

1. Pollutant Emitted: PM₁₀	2. Total Percent Efficiency of Control: 90 %
3. Potential Emissions: 32.4 lb/hour 141.8 tons/year	4. Synthetically Limited? []
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 _____ to _____ tons/year	
6. Emission Factor: Process Weight Rate Reference: Rule	7. Emissions Method Code: 0
8. Calculation of Emissions (limit to 600 characters): $\text{lb/hr} = 17.31 \times (50 \text{ tons / hour})^{0.16} = 32.4$ $\text{TPY} = 32.4 \text{ lb/hr} \times 8,760 \text{ hr / yr} \times 1 \text{ ton / 2,000 lb} = 141.8$	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): Rule 62-296.320(4)(a)2., F.A.C. Emission (lb/hr) = 17.31 x (P)^{0.16}, where P = process rate (TPH). Control efficiency – 60 to 90%	

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: RULE	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units:	4. Equivalent Allowable Emissions: 32.4 lb/hour 141.8 tons/year
5. Method of Compliance (limit to 60 characters): Annual Compliance Test, EPA Method 5	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): Rule 62-296.320(4)(a)2., F.A.C.	

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: VE20	2. Basis for Allowable Opacity: <input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other
3. Requested Allowable Opacity: Normal Conditions: 20 % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance: Annual VE Test EPA Method 9	
5. Visible Emissions Comment (limit to 200 characters): Rule 62-296.320(4)(b), F.A.C.	

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): 	

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

Visible Emissions Limitation: Visible Emissions Limitation 2 of 2

1. Visible Emissions Subtype: VE99	2. Basis for Allowable Opacity: [<input checked="" type="checkbox"/>] Rule [<input type="checkbox"/>] Other
3. Requested Allowable Opacity: Normal Conditions: % Exceptional Conditions: 100 % Maximum Period of Excess Opacity Allowed: 60 min/hour	
4. Method of Compliance: Best Operational Practices	
5. Visible Emissions Comment (limit to 200 characters): Rule 62-210.700(1), F.A.C. allows excess emissions for 2 hr / 24 hr during startup, shutdown, and/or malfunction.	

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 [X] Attached, Document ID: <u>Part II</u> [] 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

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):			
Citrus Peel Dryer No. 3 with Waste Heat Evaporator			
4. Emissions Unit Identification Number:			
ID: 003		<input type="checkbox"/> No ID <input type="checkbox"/> ID Unknown	
5. Emissions Unit Status Code:	6. Initial Startup Date:	7. Emissions Unit Major Group SIC Code:	8. Acid Rain Unit?
A		20	<input type="checkbox"/>
9. Emissions Unit Comment: (Limit to 500 Characters)			
Feed Mill No. 3 includes a citrus pulp dehydrator designed to evaporate 60,000 lb/hr of water from a max. throughput of 50 TPH of pressed peel, producing 40,000 lb/hr of dried peel. It is fired with natural gas, with fuel oil backup; Max. heat input, 84 MMBtu/hr. The associated waste heat evaporator will evaporate 120,000 lb/hr of water from press liquor, producing citrus molasses. See Attachment Part II.			

Emissions Unit Control Equipment

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

Wet Scrubber, medium efficiency for PM control2. Control Device or Method Code(s): **2****Emissions Unit Details**

1. Package Unit:

Manufacturer:

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:	84	mmBtu/hr
2. Maximum Incineration Rate:	lb/hr	tons/day
3. Maximum Process or Throughput Rate:	100,000	lb/hr*
4. Maximum Production Rate:	40,000	lb/hr**
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):		
* pressed wet peel ** dried peel		

C. EMISSIONS UNIT REGULATIONS (Regulated Emissions Units Only)

List of Applicable Regulations

The proposed addition of the WHE does not change the applicable regulations for Citrus Peel Dryers Nos. 1, 2, and 3 as identified in the current Title V Permit No. 0810007-003-AV.

[illegible]

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? EU3		2. Emission Point Type Code: 3	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point): Gases from the dehydrator pass through the waste heat evaporator and exhaust from the evaporator stack and relief stack.			
6. ID Numbers or Descriptions of Emission Units with this Emission Point in Common: EU2 and EU3			
5. Discharge Type Code: V	6. Stack Height: 95 feet		7. Exit Diameter: 3.2 feet
8. Exit Temperature: 100 °F	9. Actual Volumetric Flow Rate: 17,000 acfm	10. Water Vapor: %	
11. Maximum Dry Standard Flow Rate: dscfm		12. Nonstack Emission Point Height: feet	
13. Emission Point UTM Coordinates: Zone: East (km): North (km):			
14. Emission Point Comment (limit to 200 characters): Exit diameter = 3.17 (rounded to 3.2).			

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

Segment Description and Rate: Segment 1 of 3

1. Segment Description (Process/Fuel Type) (limit to 500 characters): Industrial Processes – Food and Agriculture – Fuel Fired Equipment – Natural Gas: Process Heaters		
2. Source Classification Code (SCC): 3-02-900-03		3. SCC Units: Million Cubic Feet Burned
4. Maximum Hourly Rate: 0.088	5. Maximum Annual Rate: 775	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit: 950
10. Segment Comment (limit to 200 characters): Maximum hourly rate = 0.0884 (rounded to 0.088). Maximum annual rate = 774.6 (rounded to 775) based on minimum heat content. Maximum sulfur content – 1 gr / 100 cf		

Segment Description and Rate: Segment 2 of 3

1. Segment Description (Process/Fuel Type) (limit to 500 characters): Industrial Processes – Food and Agriculture – Fuel Fired Equipment – Residual Oil: Process Heaters		
2. Source Classification Code (SCC): 3-02-900-02		3. SCC Units: Thousand gallons burned
4. Maximum Hourly Rate: 0.56	5. Maximum Annual Rate: 336	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur: 1.0	12. Maximum % Ash: 0.1	9. Million Btu per SCC Unit: 150
10. Segment Comment (limit to 200 characters): Heat content (HHV) – minimum value. Annual rate = 600 hr / yr, used as backup fuel.		

E. SEGMENT (PROCESS/FUEL) INFORMATION
(All Emissions Units)**Segment Description and Rate:** Segment 3 of 3

1. Segment Description (Process/Fuel Type) (limit to 500 characters): Process Weight		
2. Source Classification Code (SCC):		3. SCC Units: Tons of Pressed Peel Processed
4. Maximum Hourly Rate: 50	5. Maximum Annual Rate: 438,000	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment (limit to 200 characters):		

Segment Description and Rate: Segment _____ of _____

1. Segment Description (Process/Fuel Type) (limit to 500 characters):		
2. Source Classification Code (SCC):		3. SCC Units:
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	13. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment (limit to 200 characters):		

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

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
PM	002		EL
PM₁₀	002		EL

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

Potential/Fugitive Emissions

1. Pollutant Emitted: PM	2. Total Percent Efficiency of Control: 90 %
3. Potential Emissions: 32.4 lb/hour 141.8 tons/year	4. Synthetically Limited? []
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 _____ to _____ tons/year	
6. Emission Factor: Process Weight Rate Reference: Rule	7. Emissions Method Code: 0
8. Calculation of Emissions (limit to 600 characters): $\text{lb/hr} = 17.31 \times (50 \text{ tons / hour})^{0.16} = 32.4$ $\text{TPY} = 32.4 \text{ lb/hr} \times 8,760 \text{ hr / yr} \times 1 \text{ ton / 2,000 lb} = 141.8$	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): Rule 62-296.320(4)(a)2., F.A.C. Emission (lb/hr) = 17.31 x (P)^{0.16}, where P = process rate (TPH). Control efficiency – 60 to 90%	

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: RULE	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units:	4. Equivalent Allowable Emissions: 32.4 lb/hour 141.8 tons/year
5. Method of Compliance (limit to 60 characters): Annual Compliance Test, EPA Method 5	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): Rule 62-296.320(4)(a)2., F.A.C.	

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

Potential/Fugitive Emissions

1. Pollutant Emitted: PM₁₀	2. Total Percent Efficiency of Control: 90 %
3. Potential Emissions: 32.4 lb/hour 141.8 tons/year	4. Synthetically Limited? []
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 _____ to _____ tons/year	
6. Emission Factor: Process Weight Rate Reference: Rule	7. Emissions Method Code: 0
8. Calculation of Emissions (limit to 600 characters): $\text{lb/hr} = 17.31 \times (50 \text{ tons / hour})^{0.16} = 32.4$ $\text{TPY} = 32.4 \text{ lb/hr} \times 8,760 \text{ hr / yr} \times 1 \text{ ton / 2,000 lb} = 141.8$	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): Rule 62-296.320(4)(a)2., F.A.C. Emission (lb/hr) = 17.31 x (P)^{0.16}, where P = process rate (TPH). Control efficiency – 60 to 90%	

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: RULE	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units:	4. Equivalent Allowable Emissions: 32.4 lb/hour 141.8 tons/year
5. Method of Compliance (limit to 60 characters): Annual Compliance Test, EPA Method 5	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): Rule 62-296.320(4)(a)2., F.A.C.	

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: VE20	2. Basis for Allowable Opacity: <input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other
3. Requested Allowable Opacity: Normal Conditions: 20 % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance: Annual VE Test EPA Method 9	
5. Visible Emissions Comment (limit to 200 characters): Rule 62-296.320(4)(b), F.A.C.	

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):	

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

Visible Emissions Limitation: Visible Emissions Limitation 2 of 2

1. Visible Emissions Subtype: VE99	2. Basis for Allowable Opacity: [X] Rule [] Other
3. Requested Allowable Opacity: Normal Conditions: % Exceptional Conditions: 100 % Maximum Period of Excess Opacity Allowed: 60 min/hour	
4. Method of Compliance: Best Operational Practices	
5. Visible Emissions Comment (limit to 200 characters): Rule 62-210.700(1), F.A.C. allows excess emissions for 2 hr / 24 hr during startup, shutdown, and/or malfunction.	

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:	
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 [X] Attached, Document ID: <u>Part II</u> [] 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

PART II

SUPPORTING INFORMATION

TABLE OF CONTENTS

<u>SECTION</u>	<u>PAGE</u>
1.0 INTRODUCTION	1
1.1 EXISTING FACILITY	1
1.2 CITRUS PEEL DRYERS AND WASTE HEAT EVAPORATORS.....	1
1.3 APPLICABLE REQUIREMENTS	2

LIST OF TABLES

Table 1 VOC Emissions for Dryers Nos. 1, 2 and 3 Tropicana Products, Inc.

LIST OF FIGURES

Figure 1 Tropicana Products, Inc. Bradenton Feedmill Current Process Flow
Figure 2 Tropicana Products, Inc. Bradenton Feedmill Proposed Process Flow

LIST OF ATTACHMENTS

ATTACHMENT A TITLE V PERMIT CONDITIONS FOR CITRUS PEEL DRYERS
NUMBERS 1, 2 AND 3

1.0 INTRODUCTION

Tropicana Products, Inc. is proposing to add a 120,000-lb/hr waste heat evaporator (WHE) to the existing Bradenton Citrus Processing Plant. The WHE will increase the evaporative capacity of the existing three WHEs that are used for the recovery of citrus oil (i.e., d'limonene). The three existing citrus peel dryers have associated WHEs to evaporate 100,000 lb/hr, 50,000 lb/hr and 50,000 lb/hr, respectively. The added WHE evaporator will be connected to Citrus Peel Dryer No. 3 and the two existing 50,000 lb/hr WHEs will be combined to form a single 100,000 lb/hr WHE serving Citrus Dryer No. 2. Attachment A presents the existing Title V permit conditions for the citrus peel dryers.

The project will result in a net decrease in emissions of volatile organic compounds (VOCs). In addition, the WHEs act as a medium efficiency wet scrubber that reduce particulate matter emissions.

1.1 EXISTING FACILITY

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

The plant contains three citrus feed mills, four citrus pellet mills (including two pellet coolers and associated pellet, bulk cooling reels, and Ross coolers), one glass plant (one glass plant was closed in 2000), cogeneration facility [including combustion turbine, HRSG, duct burner, auxiliary boiler, sanitary process steam boiler (used to produce 5-fold citrus oil)], and a wastewater treatment system (including a package steam boiler and an anaerobic reactor with a biogas flare).

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

1.2 CITRUS PEEL DRYERS AND WASTE HEAT EVAPORATORS

Figure 1 presents a flow diagram of the current feedmill process. The three citrus peel dryers (Citrus Peel Dryers No. 1, No. 2 and No. 3) are connected to WHEs with evaporative capacities of 100,000 lb/hr, 50,000 lb/hr and 50,000 lb/hr. Together these WHEs provide the 60,000-lb/hr evaporative

capacity required for each of the three dryers. However, the configuration does not provide the optimum evaporative capacity desired to recover citrus oil from the three existing citrus peel dryers. Figure 2 presents a flow diagram of the proposed future configuration of citrus feedmill operation. The project will consist of installing an existing 120,000 lb/hr WHE obtained from Florida Global and connecting this WHE to Citrus Peel Dryer No. 3. The existing two 50,000 lb/hr WHEs will be combined into a single 100,000 lb/hr WHE to serve Citrus Dryer No. 2. The existing 100,000 lb/hr WHE will only serve Citrus Dryer No. 1. The controls for the WHEs will be automated to better control the process. The additional WHE will not change the existing capacity of the citrus peel dryers or the amount of citrus peel that can be currently processed.

The addition of the WHE will result in a net reduction of VOCs from the citrus peel drying process. Table 1 presents the VOC emissions for the years 1999, 2000 and 2001. The average VOC emissions for 2000 and 2001 are about 1,700 tons/year. The citrus oil (i.e., d'limonene) recovery with the additional WHE is projected to increase by about 450 tons/year, which will reduce the VOC emissions approximately proportionally for each citrus peel dryer. Table 1 presents the projected reduction in VOC emissions from the facility.

1.3 APPLICABLE REQUIREMENTS

A modification is defined in Rule 62-210.200 Florida Administrative Code (F.A.C.) as any physical change in, or a change in the method of operation of, or addition to a facility which would result in an increase in the actual emissions of any air pollutant subject to regulation under the Clean Air Act. A physical change or a change in the method of operation does not include routine replacement, repair or replacement of components part of an emission unit. A modification to a major source of air pollution, such as the Tropicana Bradenton Citrus Processing Plant, may be subject to review under the Department's PSD rules codified in Rule 62-212.400 F.A.C.

As shown in Table 1, the proposed project will decrease VOC emissions from the facility. Therefore, PSD review is not applicable. A construction permit is being submitted to provide information to the Department for the addition of the WHE and change in configuration of the WHEs at the Bradenton facility.

Table 1. VOC Emissions from Dryers 1, 2 and 3
Tropicana Products, Inc. Bradenton

	VOC Emissions (TPY)			VOC Emissions 2000/2001 Average (TPY)	VOC Emissions Projected Average (TPY)	VOC Emissions Projected Average (TPY)
	1999	2000	2001			
Dryer #1	491.0	548.0	640.3	594.1	436.9	-157
Dryer #2	407.0	517.9	596.9	557.4	409.9	-148
Dryer #3	425.0	497.3	599.8	548.6	403.4	-145
Total	1,323.0	1,563.2	1,837.0	1,700.1	1,250.1	-450

Note: TPY = tons per year.

Source: 1999, 2000 and 2001 Annual Operating Reports for Air Pollutant
Emitting Facility.

Figure 1. Tropicana Products, Inc. Bradenton Feedmill Current Process Flow

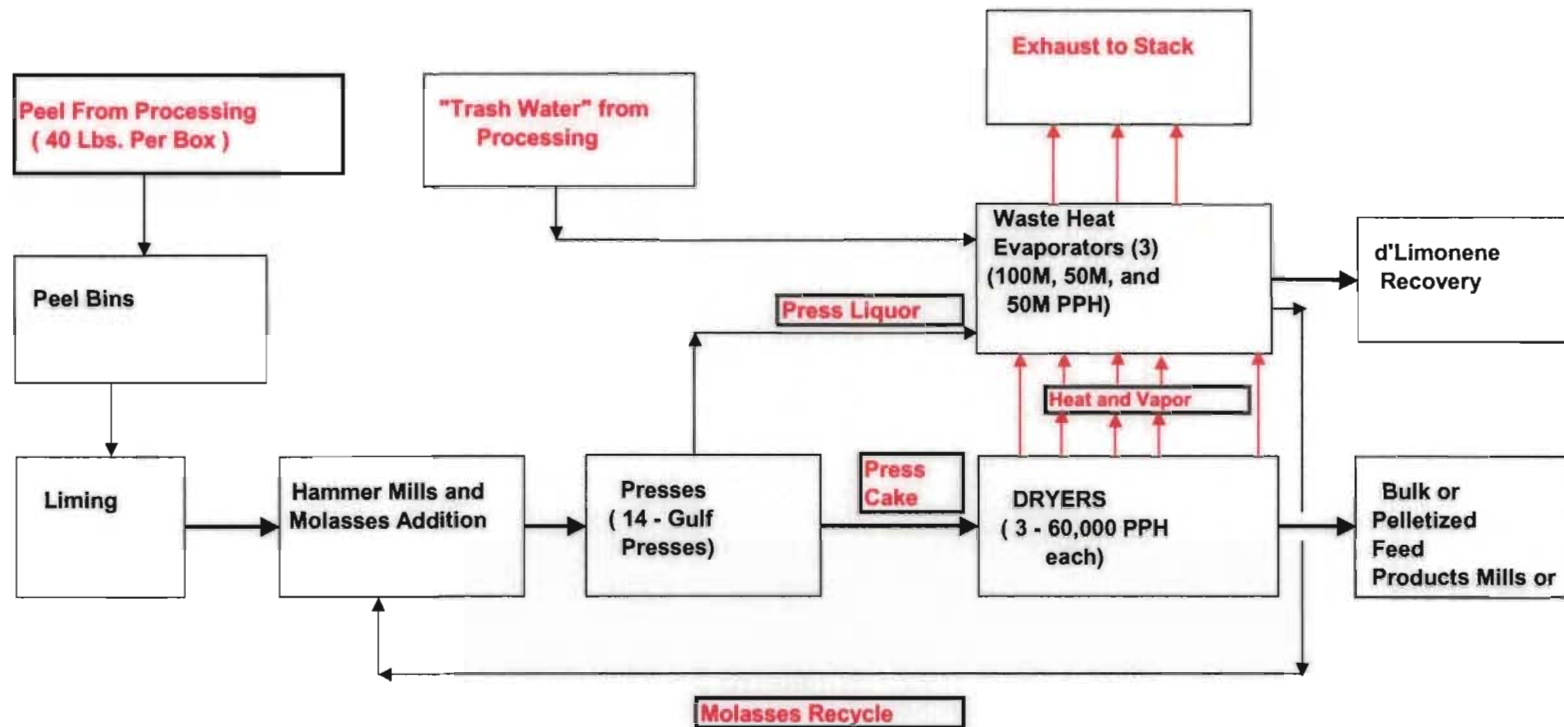
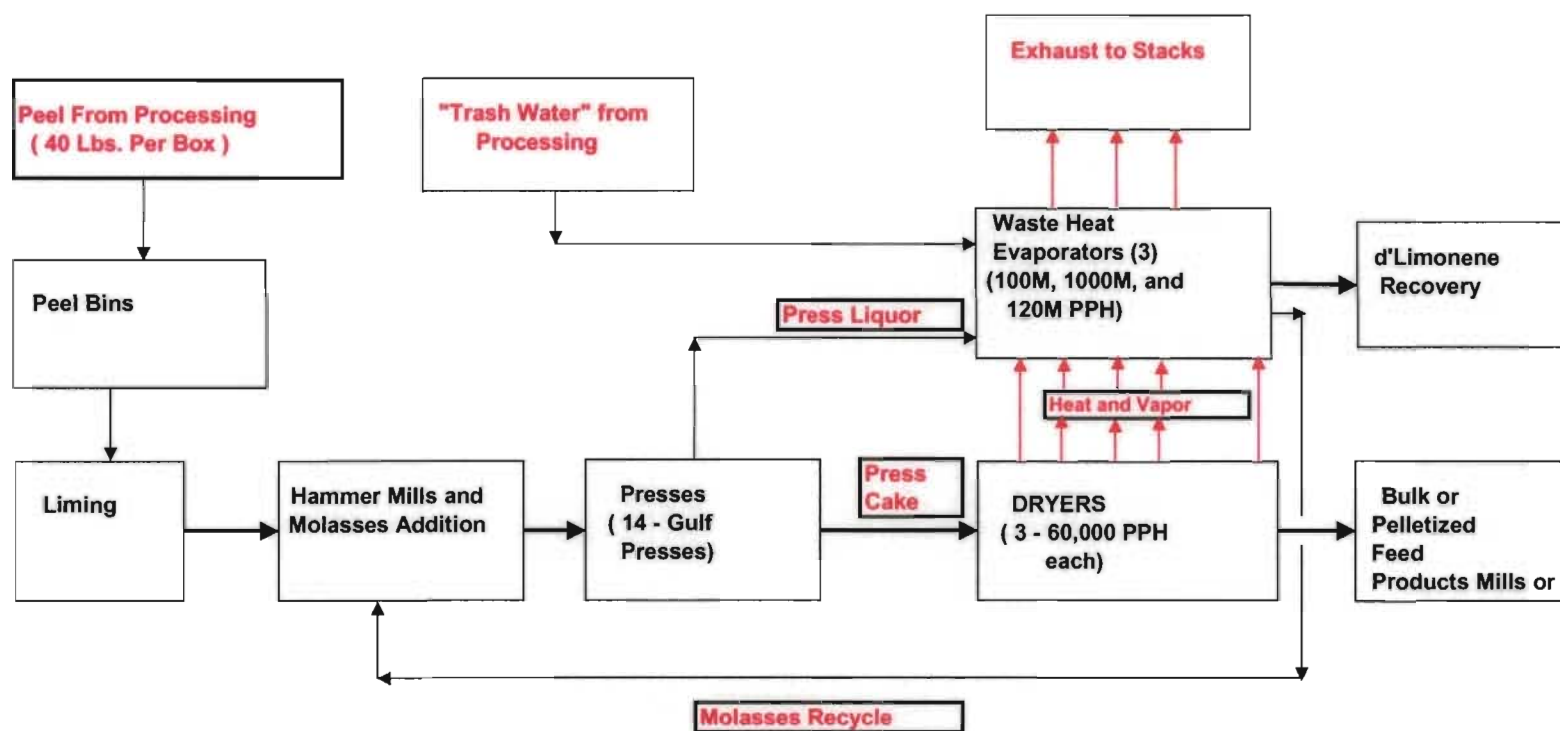


Figure 2. Tropicana Products, Inc. Bradenton Feedmill Proposed Process Flow



ATTACHMENT A

TITLE V PERMIT CONDITIONS

FOR

CITRUS PEEL DRYERS NUMBERS 1, 2 AND 3

Section III. Emissions Unit(s) and Conditions.

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

E.U.

<u>ID No.</u>	<u>Brief Description</u>
---------------	--------------------------

-001	Citrus Peel Dryer No. 1 with waste heat evaporator
-002	Citrus Peel Dryer No. 2 with waste heat evaporator
-003	Citrus Peel Dryer No. 3 with waste heat evaporator

Citrus Peel Dryer Nos. 1, 2, and 3 each include a citrus pulp dehydrator associated with a waste heat evaporator (WHE). Each dehydrator is designed to evaporate a maximum of 60,000 pounds per hour of water, fired with natural gas, with No. 2 fuel oil with a maximum sulfur content of 0.5% as a backup fuel, at a maximum design heat input rate of 84 million (MM) BTU per hour. Dehydrator No. 1 is associated with a WHE which is designed to evaporate 100,000 pounds per hour of water from the press liquor process stream. Dehydrators Nos. 2 and 3 are associated with WHEs designed to evaporate 50,000 pounds per hour of water from the press liquor. Each dehydrator processes a maximum of about 100,000 pounds per hour of pressed peel containing about 70% moisture and Brix citrus molasses. Each evaporator processes a maximum of about 66,000 pounds per hour of 9 degrees Brix press liquor and converts it to about 29,700 pounds per hour at about 20 degrees Brix. Each dehydrator and associated WHE produce a maximum of 40,000 pounds per hour of dried peel at approximately 9% moisture.

{Permitting note(s): These emissions units are regulated under 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

A.1. Capacity.

- The maximum process input rate to each peel dryer shall not exceed 50.0 tons per hour of pressed wet citrus peel.
- The maximum heat input to the dehydrator shall not exceed 84 MMBtu per hour when firing natural gas.

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

A.2. Methods of Operation - (i.e., Fuels).

Each dehydrator shall be fired with natural gas as the primary fuel with No. 2 fuel oil as a backup fuel to be used no more than 600 hours per 12 consecutive month period. The No. 2 fuel oil shall contain no more than 0.5% sulfur, by weight.

[Rules 62-210.200(PTE), 62-4.160(2), and 62-213.440(1), F.A.C.]

Emission Limitations and Standards

A.3. Particulate matter emissions shall not exceed any of the following limits:

Emissions Unit	Maximum Allowable Emissions	
	Pounds per Hour ¹	Tons per Year
001, Citrus Peel Dryer No. 1	32.4	139.41
002, Citrus Peel Dryer No. 2	32.4	139.41
003, Citrus Peel Dryer No. 3	32.4	138.1

¹Based upon the Process Weight Table equations below for the maximum permitted process rate of 50 tons per hour for each dryer.

Where: E = Emission limit in pounds/hour, and

P = Process weight rate (input process rate to the dehydrator) in tons per hour,

(i) $E = (3.59) P^{0.62}$, where P is less than or equal to 30 tons/hour, or

(ii) $E = (17.31) P^{0.16}$, where P is greater than 30 tons/hour.

[Rule 62-296.320(4)(a), F.A.C.; Air Operation Permit 0810007-002-AO]

A.4. Visible emissions from these emission units shall not be equal to or greater than 20% opacity.

[Rule 62-296.320(4)(b)(1), F.A.C.]

Test Methods and Procedures

A.5. The permittee shall test for particulate matter and visible emissions from the Citrus Peel Dryer Nos. 1, 2 and 3 on, or during the 60 day period prior to March 11.

{Permitting Note: The compliance test due date is for planning purposes only. Rule 62-297.310(7)(a)4, F.A.C. allows the permittee to conduct a formal compliance test any time during the federal fiscal year (October 1 – September 30).}

Emission testing shall be conducted while operating each dryer within 90 - 100% of the maximum process input rate of 50 tons/hr., when practical. If it is not practical to test at the maximum process input rate, then the source may be tested at a lower rate. A compliance test submitted at a rate less than 90% of the maximum permitted rate shown above will automatically constitute an amended permit at 110% of the test rate. Once the unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity*.

* Clarification: When a unit is limited to an operating rate at 110% of the tested rate, the permittee may provide notice of an additional test (as in notification condition 16). That notice may specify a 15 day period when the unit will be allowed to operate at higher capacities for the purpose of additional testing. For example, the first five days of the 15 day period may be used to bring the unit up to a higher production level; the next five days may be used for the tests themselves. After the final test, the unit must be returned to the capacity which existed prior to the most recent test. Upon written approval by the Department of the most recent test results, the unit may then operate at 110% of the most recent test load, not to exceed the maximum permitted rate.

The test results shall be submitted to the Air Compliance Section of this office within 45 days of testing. Acceptance of the test by this office will automatically constitute an amended permit at the higher tested rate plus 10%, but in no case shall the maximum permitted rate shown above be exceeded. Failure to submit the following records with the test report may invalidate the test and fail to provide reasonable assurance of compliance:

- The pressed wet peel input rate to the dryer during the test.
- The natural gas or fuel oil usage rate to the dryer during the test.
- If applicable, documentation of the fuel oil's type and sulfur content that was used during the test.
- The WHEs operating parameters, which would indicate proper operation of the water spray nozzles, shall be recorded during the particulate emission compliance test. These WHE operating parameters could include water spray rate (gallons/minute), water feed pump/spray operating pressure, or other parameters that are used to control and monitor the operation of the WHE. The permittee shall provide to the Department a monitoring plan of the proposed operating parameters to be used to monitor proper operation of the WHEs within 60 days of the effective date of this permit. (Note: The parameter(s) and their operating levels during the compliance test will be used to provide reasonable assurance on an ongoing basis that the unit is being operated normally and in compliance with the standards - See Condition No. A.11.) At least one reading shall be taken and recorded during each run of the particulate emission compliance test and the readings shall be included with any peel dryer test report.

[Rules 62-297.310(2) and 62-4.070(3), F.A.C.]

A.6. Compliance with the emission limitations of Conditions A.3 and A.4 shall be determined using EPA Methods 1, 2, 3, 4, 5, and 9 contained in 40 CFR 60, Appendix A and adopted by reference in Chapter 62-297, F.A.C. The EPA Method 9 test shall be conducted by a certified observer and be a minimum of sixty (60) minutes in duration. The minimum requirements for stationary point source emission test procedures and reporting shall be in accordance with 40 CFR 60 Appendix A and Chapter 62-297, F.A.C. [Chapter 62-297, F.A.C.]

A.7. Compliance testing of the dryer/waste heat evaporator shall be conducted when firing No. 2 fuel oil if fuel oil has been used in the dryer for more than 400 hours for the previous 12 months, or if it is expected to be used in the dryer for more than 400 hours during the next 12 months. If the test is conducted while firing natural gas and in the 12 month period following the test No. 2 fuel oil is burned for more than 400 hours, then an additional VE test (while burning No. 2 oil in the dryer) shall be conducted within 30 days of having passed the 400 hour fuel oil burning level. The permittee shall submit a statement of the fuel operating mode (type of fuel and heat input rate) as a part of the compliance test report. Failure to submit the fuel operation mode statement may invalidate the data and fail to provide reasonable assurance of compliance.
[Rule 62-4.070(3), F.A.C.]

A.8. If particulate and visible emission testing is conducted while firing No. 2 fuel oil, compliance with the No. 2 oil sulfur content limitation in Condition A.2 shall be demonstrated during the test through submission of either of the following with the test report:

- a. Results of fuel oil analysis from the fuel oil vendor showing the sulfur content representative of the fuel fired during the compliance test;
- b. Results of a fuel oil analysis showing the sulfur content for a fuel oil sample taken during the compliance test.

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

Monitoring, Recordkeeping and Reporting Requirements

A.9. In order to document compliance with the Conditions A.1 and A.2, the permittee shall maintain a record of fuel oil firing in each dehydrator. The records shall include the following for each period fuel oil is fired:

- a. date;
- b. beginning and end time of fuel oil firing;
- c. calculated duration of fuel oil firing (hours) for the above period; and
- d. accumulated hours of fuel oil firing for the most recent 12 month period (hours/12 consecutive month period).

In addition to the above operation records the permittee shall maintain records of the sulfur content of all fuel oil delivered for use in each dehydrator. These records may be based on vendor supplied analysis data or upon analysis of samples taken on site at the plant. These records shall be recorded in a permanent form suitable for inspection by the Department upon request.

[Rule 62-213.440(1), F.A.C.]

A.10. In order to document compliance with Condition A.1, the permittee shall maintain monthly records of the weight of wet peel input processed and/or dried peel

produced for each dryer. These records shall be recorded in a permanent form suitable for inspection by the Department upon request.
[Rule 62-4.070(3), F.A.C.]

A.11. Waste Heat Evaporator (WHE) operating parameters shall be maintained at a minimum of 90% of the values measured and recorded during the most recent particulate matter emission compliance test. WHE parameters shall be recorded at least once during each 8-hour shift.

[Rules 62-210.650 and 62-213.440(1), F.A.C.]