

Check Sheet

Company Name: LYKES PASCO
Permit Number: AC51-150207
PSD Number: _____
Permit Engineer: _____

Application:

- Initial Application
- Incompleteness Letters
- Responses
- Waiver of Department Action
- Department Response
- Other

Cross References:

-
-
-

Intent:

- Intent to Issue
- Notice of Intent to Issue
- Technical Evaluation
- BACT Determination
- Unsigned Permit

Correspondence with:

- EPA
- Park Services
- Other
- Proof of Publication
- Petitions - (Related to extensions, hearings, etc.)
- Waiver of Department Action
- Other

Final Determination:

- Final Determination
- Signed Permit
- BACT Determination
- Other

Post Permit Correspondence:

- Extensions/Amendments/Modifications
- Other

RECEIVED

MAY 25 1990

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

DER DAQ..

In the matter of:)
)
LYKES PASCO, INC.,)
)
Petitioner.)
_____)

OGC File No. 90-0821
Permit No. AC51-166207 166207?
ASP-89-A-01

ORDER APPROVING REQUEST

FOR

ALTERNATE TEST PROCEDURES AND REQUIREMENTS

Pursuant to Rule 17-2.700(3), Florida Administrative Code, Lykes Pasco, Inc., petitioner, submitted a request for approval of the use of EPA Method 9 in lieu of EPA Method 5 for compliance verification procedures for petitioner's No. 2 Coffee Bean Line, permit number AC51-166207, located in Pasco County.

Having considered petitioner's written request and all supporting documentation, the following Findings of Fact, Conclusions of Law, and Order are entered:

FINDINGS OF FACT

1. On July 27, 1989, petitioner specifically requested to use EPA Method 9 in lieu of EPA Method 5 for annual testing requirements for particulate matter emissions from the No. 2 Coffee Bean Line as specified in permit number AC51-166207, specific condition numbers 4 and 5. Further, petitioner, requests an emission limit of no visible emissions (5% opacity) in lieu of the less stringent 20% opacity presently allowed.

2. As justification for the waiver of the annual EPA Method 5 compliance test requirements, petitioner stated that an annual EPA Method 9 test would be conducted with a more stringent visible emission limit of no visible emissions (5% opacity).

CONCLUSIONS OF LAW

1. The Department has jurisdiction to consider petitioner's request pursuant to Section 403.061, Florida Statutes, and Rule 17-2.700(3), Florida Administrative Code.

2. The Department retains the right to require a quantitative compliance test pursuant to 17-2.700(2)(b) if, after investigation, it is believed that any applicable emission standard is being violated.

3. Petitioner has demonstrated that the proposed alternate compliance verification method would be adequate to verify the compliance of the unit with the particulate matter and visible emission limiting standards.

ORDER

Having considered petitioner's written request and supporting documentation, it is hereby ordered that:

1. The relief requested by petitioner is granted;

2. Petitioner shall conduct the appropriate visible emission tests using the procedures specified in Rule 17-2.700; and

3. Petitioner shall submit the test results to the Deputy Assistant Secretary for the Southwest District prior to September 30, 1990.

RIGHT TO APPEAL

Any party to this Order has the right to seek judicial review of the Order pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400; 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 of Appeal must be filed within 30 days from the date the Notice of Agency Action is filed with the Clerk of the Department.

PETITION FOR ADMINISTRATIVE REVIEW

1. A person whose substantial interests are affected by the Department's decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, 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 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within 21 days of receipt of this Order. Petitioner shall mail a copy of the petition to the applicant at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

2. The petition shall contain the following information:

(a) The name, address, and telephone number of each petitioner, the applicant's name and address, and the Department File Number;

(b) A statement of how and when each petitioner received notice of the Department's action or proposed action;

(c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;

(d) A statement of the material facts disputed by petitioner, if any;

(e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;

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

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

3. If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this Order. Persons whose substantial interests will be affected by any decision of the Department with regard to the applicant have the right to petition to become a party to the proceeding. The petition must conform with the requirements specified above and be filed (received) within 21 days of

receipt of this notice in the Office of General Counsel¹ at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

4. This Order constitutes final agency action unless a petition is filed in accordance with the above paragraphs or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition and conforms to Rule 17-103.070. F.A.C. Upon timely filing of a petition or a request for an extension of time this Order will not be effective until further Order of the Department.

DONE AND ORDERED this 23 day of May, 1990 in
Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION


DALE TWACHTMANN


Secretary

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

(904) 488-4805

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing Order has been mailed, postage prepaid, to Mr. M. J. Mulholland, Lykes Pasco, Inc., P. O. Box 97, Dade City, Florida, 32397-0097, this 24th day of May, 1990.


GARY SMALLRIDGE
Assistant General Counsel

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-1400

Telephone (904) 488-9730



State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

For Routing To Other Than The Addressee	
To: _____	Location _____
To: _____	Location _____
To: _____	Location _____
From _____	Date _____

Interoffice Memorandum

To: Dale Twachtmann
From: Steve Smallwood *SSm*
Date: May 14, 1990
Subj: Order Approving Alternate Test Procedures and Requirements: Lykes Pasco ASP-89-A-01

Attached is an Alternate Test Procedure Order approving Lykes Pasco, Inc.'s request to use EPA Method 9 (Visible Emissions Observation) with an emission limit of no visible emissions (5% opacity) in lieu of EPA Method 5 (Stack Sampling).

The Bureau of Air Regulation, the affected District, the affected county program and the Office of General Counsel have reviewed the request.

I recommend your approval.

SSm/ht

RECEIVED

MAY 25 1990

DEPT. ENV.



RECEIVED

APR 13 1990

DER - BA

Lykes Pasco, Inc.
Post Office Box 97
Dade City, FL 34297-0097
Telephone: (904) 567-5211

April 11, 1990

Mr. Harry Kearns
Department of Environmental Regulation
4520 Oak Fair Boulevard
Tampa FL 33610-7347

RE: Certificate of Completion, Lykes Pasco, Inc.
Permit No. AC51-156207

Dear Mr. Kearns:

Attached are four (4) completed Certificates of Completion of Construction concerning the No. 2 Coffee Line at Lykes Pasco, Inc. Also attached is a check for \$750.00. Results of visible emission tests conducted on the new line have been previously submitted to you under separate cover. This should complete the submission of data required. If you have any further questions please do not hesitate to call me. I look forward to hearing from you in the near future.

Sincerely,

LYKES PASCO, INC.

M. J. Mulholland
Quality Assurance Project Manager

MJM:mw

XC: **Bill Thomas**
Air Quality
Department of Environmental Regulation
2600 Blair Stone Rd.
Tallahassee FL 32399-2400

Attachments

*4-16
FYI - I guess
we can just
put this on
the file -
Patley*



STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION
AIR POLLUTION SOURCES
CERTIFICATE OF COMPLETION OF CONSTRUCTION*

PERMIT NO. AC51-156207 DATE: March 21, 1990

Company Name: Lykes Pasco, Inc. County: Pasco

Source Identification(s): No. 2 Coffee Line

Actual costs of serving pollution control purpose: \$ 3,500

Operating Rates: Roaster Chaff Cyclone/Cooler Design Capacity: 750 lb/hr / 640 lb/hr

Expected Normal 750 / 640 lb/hr During Compliance Test 750 / 640 lb/hr*

Date of Compliance Test: 3/15/90 (Attach detailed test report)

Test Results:	Pollutant	Actual Discharge	Allowed Discharge
	<u>Roaster Chaff Cyc-VE</u>	<u>0%</u>	<u>5%</u>
	<u>Cooler-VE</u>	<u>0%</u>	<u>5%</u>

Date plant placed in operation: 3/5/90

This is to certify that, with the exception of deviations noted**, the construction of the project has been completed in accordance with the application to construct and Construction Permit No. AC51-156207 dated 8/17/89.

A. Applicant:

Norvell W. Hunt, Director of Tech. Services Norvell W. Hunt
Name of Person Signing (Type) Signature of Owner or Authorized Representative and Title

Date: _____ Telephone: (904) 567-5211

B. Professional Engineer:

John B. Koogler, Ph.D., P.E. _____
Name of Person Signing (Type) Signature of Professional Engineer

Koogler & Associates, Environmental Services Florida Registration No. 12925
Company Name

Date: 3/21/90

(Seal)

4014 N.W. 13th St., Gainesville, FL 32609
Mailing Address

(904) 377-5822
Telephone Number

*This form, satisfactorily completed, submitted in conjunction with an existing application to construct permit and payment of application processing fee will be accepted in lieu of an application to operate.

**As built, if not built as indicated include process flow sketch, plot plan sketch, and updates of applicable pages of application form.

*Equivalent process rate. Successive 300 lb. batches of green beans were fed to the roaster at a 2.5 batch/hr. rate. This is equivalent to 2.5 batches per hour of roasted beans at 256 lb/batch to the cooler.

88202-1642

MAR 23 1990



KOGLER & ASSOCIATES

ENVIRONMENTAL SERVICES

4014 NW THIRTEENTH STREET
GAINESVILLE, FLORIDA 32609
904/377-5822 • FAX 377-7158

KA 207-90-01

March 21, 1990

Mr. Mike Mulholland
Lykes Pasco, Inc.
P.O. Box 97
Dade City, FL 33526

Subject: Certificate of Completion of Construction
Lykes Pasco, Inc.
No. 2 Coffee Line

Dear Mike:

Enclosed are five (5) copies of the Certificate of Completion of Construction for the No. 2 Coffee Line. Please have Norv Hunt sign and date all five copies. Keep one copy for your records and send four (4) copies, along with a check for \$750, to:

Mr. Harry Kerns
Florida Department of
Environmental Regulation
Southwest District Office
4520 Oak Fair Blvd.
Tampa, FL 33610-7347.

If you have any questions, please do not hesitate to contact me.

Very truly yours,

KOGLER & ASSOCIATES

John B. Koogler, Ph.D., P.E.

JBK:wa
Enc.



State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

8-22-89
To SP2 11:04 A

For Routing To Other Than The Addressee	
To: _____	Location: _____
To: _____	Location: _____
To: _____	Location: _____
From: _____	Date: _____

Interoffice Memorandum

TO: District and Local Air Program Administrators

FROM: Jim Pennington

DATE: August 22, 1989

SUBJ: ASP Request for Coffee Bean Processing Cyclones (3)
Lykes Pasco, Inc. - No. 2 Coffee Bean Line
ASP: 89-A-01

The Department has received a request for an ASP pursuant to F.A.C. Rule 17-2.700(3) from Dr. John B. Koogler, P.E. of record for Lykes Pasco, Inc., in letters received on July 27 and 28, 1989. Specifically, the request is for an ASP of "no visible emissions" (5% opacity) using EPA Reference Method 9 for compliance verification in lieu of conducting a mass emissions test for particulate matter using EPA Reference Method 5 on a roaster chaff cyclone, a cooler cyclone, and an extractor cyclone, which is required by construction permit No. AC 51-156207; also, it would supercede the general visible emissions standard of "less than 20% opacity" allowed pursuant to F.A.C. Rule 17-2.610(2).

Information enclosed are the following:

- 1) The original application package (AC 51-156207) for the new No. 2 Coffee Bean Line:
 - a) application form and support data;
 - b) visible emissions tests on the No. 1 Coffee Bean Line cyclones; and,
 - c) Air Operation Permit (AO 51-149866) for the existing No. 1 Coffee Bean Line issued August 29, 1988, which contains the allowable visible emissions standard of "no visible emissions" (5% opacity) using EPA Reference Method 9 for compliance verification for its associated cyclones.
- 2) Dr. John B. Koogler's letter received July 27, 1989;
- 3) Dr. John B. Koogler's letter received July 28, 1989; and,

Memorandum
Page Two
August 22, 1989

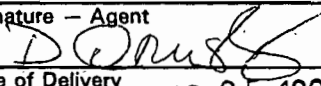
- 4) The Final Determination for the No. 2 Coffee Bean Line's Construction Permit No. AC 51-156207.

Please review the enclosed information and provide written responses to me no later than September 15, 1989.

JP/BM/t

SENDER: Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.
 Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. Show to whom delivered, date, and addressee's address. 2. Restricted Delivery (Extra charge)

3. Article Addressed to: Mr. Norvell W. Hunt Director of Technical Services Lykes Pasco, Inc. P. O. Box 97 Dade City, FL 33525	4. Article Number P 938 762 658
	Type of Service: <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise
	Always obtain signature of addressee or agent and DATE DELIVERED.
5. Signature - Address X	8. Addressee's Address (ONLY if requested and fee paid)
6. Signature - Agent X 	
7. Date of Delivery AUG 25 1989	

PS Form 3811, Mar. 1988 * U.S.G.P.O. 1988-212-865 DOMESTIC RETURN RECEIPT

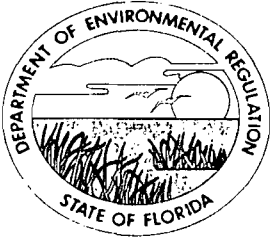
P 938 762 658

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
 NOT FOR INTERNATIONAL MAIL
 (See Reverse)

Sent to Mr. Norvell W. Hunt, Lykes	
Street and No. Pasco, Inc. P.O. Box 97	
P.O., State and ZIP Code Dade City, FL 33525	
Postage	S
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	S
Postmark or Date Mailed: 8-23-89 Permit: AC 51-156207	

PS Form 3800, June 1985



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION NOTICE OF PERMIT

Mr. Norvell W. Hunt
Director of Technical Services
Lykes Pasco, Inc.
Post Office Box 97
Dade City, Florida 33525

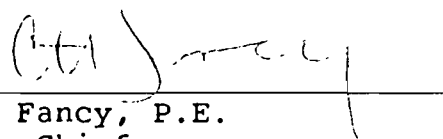
August 21, 1989

Enclosed is construction permit No. AC 51-156207 for Lykes Pasco, Inc. to construct a new coffee bean roaster, cooler and extractor (No. 2 line) at their existing facility in Dade City, Pasco County, Florida. This permit is issued pursuant to Section 403, Florida Statutes.

Any party to this permit has the right to seek judicial review of the permit pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400; 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 of Appeal must be filed within 30 days from the date this permit is filed with the Clerk of the Department.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION



C. H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality Management

Copy furnished to:

H. Kerns, SW District
J. Koogler, P.E.

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this NOTICE OF PERMIT and all copies were mailed before the close of business on August 23, 1989.

FILING AND ACKNOWLEDGEMENT
FILED, on this date, pursuant to
§120.52(9), Florida Statutes, with
the designated Department Clerk,
receipt of which is hereby
acknowledged.

Martha J. Wise August 23, 1989
Clerk Date

Final Determination

Lykes Pasco, Inc.
Pasco County
Dade City, Florida

Construction Permit No. AC 51-156207

Florida Department of Environmental Regulation
Division of Air Resources Management
Bureau of Air Quality Management
Central Air Permitting

August 17, 1989

Final Determination

The construction permit application and supplementary material have been reviewed by the Department. Public notice of the Department's Intent to Issue was published in The Tampa Tribune on July 24, 1989. The Technical Evaluation and Preliminary Determination were available for public inspection at the Department's Bureau of Air Quality Management (Bureau) office and Southwest District office.

Comments were received from Dr. John B. Koogler, P.E. of record, in letters received on July 27 and 28, 1989. The comments, which will be combined into one, will be addressed by the Bureau and the response follows:

Comment: For the roaster, cooler and extractor cyclones, the applicant is requesting an Alternate Standard Procedure (ASP) of "no visible emissions" (5% opacity) for demonstration of compliance in lieu of conducting a mass emissions test for particulate matter; and, it would also replace the general visible emissions standard imposed pursuant to F.A.C. Rule 17-2.610(2). The request would affect Specific Conditions Nos. A.3, A.4, B.3 and B.4. in the proposed permit.

Response: The Bureau has expeditiously begun processing the request for an ASP. Since the review process has not yet been completed, the recommendation will be to issue the construction permit as drafted and with the following revisions to the above referenced Specific Conditions:

Specific Conditions:

o No. A.3.:

From: The maximum total allowable particulate matter emissions from the chaff cyclone and cooler cyclone shall not exceed 2.0 lbs/hr and 8.5 tons/yr, based on F.A.C. Rule 17-2.610(1) and 750 lbs/hr processing rate of green coffee beans. EPA Reference Method 5 shall be used to test the chaff and cooler cyclones in accordance with F.A.C. Rule 17-2.700 and 40 CFR 60, Appendix A.

To: The maximum total allowable particulate matter emissions from the chaff cyclone and cooler cyclone shall not exceed 2.0 lbs/hr and 8.5 tons/yr, based on F.A.C. Rule 17-2.610(1) and 750 lbs/hr processing rate of green coffee beans. For the chaff and cooler cyclones, initial and

subsequent compliance tests shall be conducted using EPA Reference Method 5 in accordance with F.A.C. Rule 17-2.700 and 40 CFR 60, Appendix A, unless another methodology for compliance verification has been approved by the Department pursuant to F.A.C. Rule 17-2.700(3), Exceptions and Approval of Alternate Procedures and Requirements (ASP).

o No. A.4.:

From: Visible emissions from the chaff and cooler cyclones shall be less than 20% opacity. EPA Reference Method 9 shall be used to test the chaff and cooler cyclones in accordance with F.A.C. Rule 17-2.700 and 40 CFR 60, Appendix A.

To: Visible emissions from the chaff and cooler cyclones shall be less than 20% opacity. For the initial and subsequent compliance tests, EPA Reference Method 9 shall be used to test the chaff and cooler cyclones in accordance with F.A.C. Rule 17-2.700 and 40 CFR 60, Appendix A. If a visible emissions standard is approved as an ASP for Specific Condition No. A.3. and is more stringent than the standard contained in this Specific Condition, then the more stringent standard shall be applicable for compliance verification.

o No. B. 3:

From: The maximum allowable particulate matter emissions from the extractor cyclone shall not exceed 1.4 lbs/hr and 6.2 tons/yr, based on F.A.C. Rule 17-2.610(1) and 450 lbs/hr processing rate of ground roasted coffee beans. EPA Reference Method 5 shall be used to test the extractor cyclone in accordance with F.A.C. Rule 17-2.700 and 40 CFR 60, Appendix A.

To: The maximum allowable particulate matter emissions from the extractor cyclone shall not exceed 1.4 lbs/hr and 6.2 tons/yr, based on F.A.C. Rule 17-2.610(1) and 450 lbs/hr processing rate of ground roasted coffee beans. For the extractor cyclone, initial and subsequent compliance tests shall be conducted using EPA Reference Method 5 in accordance with F.A.C. Rule 17-2.700 and 40 CFR 60, Appendix A, unless another methodology for compliance verification has been approved by the Department pursuant to F.A.C. Rule 17-2.700(3), ASP.

o No. B.4.:

From: Visible emissions from the extractor cyclone shall be less than 20% opacity. EPA Reference Method 9 shall be used to test the extractor cyclone in accordance with F.A.C. Rule 17-2.700 and 40 CFR 60, Appendix A.

To: Visible emissions from the extractor cyclone shall be less than 20% opacity. For the initial and subsequent compliance tests, EPA Reference Method 9 shall be used to test the extractor cyclone in accordance with F.A.C. Rule 17-2.700 and 40 CFR 60, Appendix A. If a visible emissions standard is approved as an ASP for Specific Condition No. B.3. and is more stringent than the standard contained in this Specific Condition, then the more stringent standard shall be applicable for compliance verification.

Attachments to be Incorporated:

10. Dr. John B. Koogler's letter received July 27, 1989.
11. Dr. John B. Koogler's letter received July 28, 1989.

The Bureau will incorporate the revisions in the construction permit, as referenced above in the final determination. It is recommended that the construction permit be issued as drafted, with the above revisions and attachments incorporated.



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

PERMITTEE:
Lykes Pasco, Inc.
P. O. Box 97
Dade City, Florida 33525

Permit Number: AC 51-156207
Expiration Date: June 30, 1990
County: Pasco
Latitude/Longitude: 28°22'32"N
82°11'20"W

Project: No. 2 Coffee Bean
Line: Roaster and Extractor
and Associated Appurtenances

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code (F.A.C.) Chapters 17-2 and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

For the construction/installation of a new coffee bean line (No. 2), consisting of a coffee bean roaster, extractor, and associated appurtenances. The roaster will have two emission points, a chaff cyclone system and a "cooler," which is a cyclone system. The No. 2 extractor will use the existing cyclone system associated with the existing No. 1 extractor. The No. 2 line will also utilize other equipment that is existing and mutual to the two lines, Nos. 1 and 2, which are the roasted coffee bean storage bins (4), the blender and the grinder. The project will take place at the permittee's existing facility located on Highway 301 North in Dade City, Florida. The UTM coordinates are Zone 17, 383.5 km East and 3139.2 km North.

The Source Classification Codes are:

1. Coffee Roasting - 2095:
 - o 3-02-002-02 Direct Fired Roaster Tons Green Beans
 - o 3-02-002-03 Stoner/Cooler Tons Green Beans
 - o 3-02-002-99 Extractor Tons Product
2. Food and Agriculture-Fuel Fired Equipment
 - o 3-02-900-3 Process Heaters-Natural Gas 10⁶ ft³ Burned

The sources shall be in accordance with the permit application, plans, documents, amendments and drawings, except as otherwise noted in the General and Specific Conditions.

Attachments are listed below:

1. Application to Construct Air Pollution Sources, DER Form 17-1.202(16), received October 10, 1988.
2. Mr. C. H. Fancy's letter dated November 16, 1988.
3. Dr. John B. Koogler's letter with enclosure received November 23, 1988.

PERMITTEE:
Lykes Pasco, Inc.

Permit No. AC 51-156207
Expiration Date: June 30, 1990

Attachments Continued:

4. Mr. C. H. Fancy's letter dated December 22, 1988.
5. Dr. John B. Koogler's letter received February 20, 1989.
6. Mr. C. H. Fancy's letter dated March 24, 1989.
7. Dr. John B. Koogler's letter received May 25, 1989.
8. Mr. James T. Wilburn's letter dated August 15, 1983.
9. Technical Evaluation and Preliminary Determination dated July 11, 1989.
10. Dr. John B. Koogler's letter received July 27, 1989.
11. Dr. John B. Koogler's letter received July 28, 1989.

GENERAL CONDITIONS:

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.

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

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

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

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

PERMITTEE:
Lykes Pasco, Inc.

Permit No. AC 51-156207
Expiration Date: June 30, 1990

GENERAL CONDITIONS:

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.

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.

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 any 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.

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.

PERMITTEE:
Lykes Pasco, Inc.

Permit No. AC 51-156207
Expiration Date: June 30, 1990

GENERAL CONDITIONS:

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.

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 proscribed 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.

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.

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 17-4.120 and 17-30.300, 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.

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

13. 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 for 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.

PERMITTEE:
Lykes Pasco, Inc.

Permit No. AC 51-156207
Expiration Date: June 30, 1990

GENERAL CONDITIONS:

c. Records of monitoring information shall include:

- the date, exact place, and time of sampling or measurements;
- the person responsible for performing the sampling or measurements;
- the dates analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and
- the results of such analyses.

14. 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.

SPECIFIC CONDITIONS:

A. No. 2 Coffee Bean Roaster

1. The source may operate continuously (i.e., 8,760 hrs/year).
2. The maximum total process input rate shall not exceed 750 lbs/hr and 3285 tons/yr of green coffee beans, which is based on a maximum total process input rate of 300 lbs/batch of green coffee beans and 2.5 batches/hr.
3. The maximum total allowable particulate matter emissions from the chaff cyclone and cooler cyclone shall not exceed 2.0 lbs/hr and 8.5 tons/yr, based on F.A.C. Rule 17-2.610(1) and 750 lbs/hr processing rate of green coffee beans. For the chaff and cooler cyclones, initial and subsequent compliance tests shall be conducted using EPA Reference Method 5 in accordance with F.A.C. Rule 17-2.700 and 40 CFR 60, Appendix A, unless another methodology for compliance verification has been approved by the Department pursuant to F.A.C. Rule 17-2.700(3), Exceptions and Approval of Alternate Procedures and Requirements (ASP).
4. Visible emissions from the chaff and cooler cyclones shall be less than 20% opacity. For the initial and subsequent compliance tests, EPA Reference Method 9 shall be used to test the chaff and cooler cyclones in accordance with F.A.C. Rule 17-2.700 and 40 CFR 60, Appendix A. If a visible emissions standard is approved as an ASP for Specific Condition No. A.3. and is more stringent than the standard contained in this Specific Condition, then the more stringent standard shall be applicable for compliance verification.

PERMITTEE:
Lykes Pasco, Inc.

Permit No. AC 51-156207
Expiration Date: June 30, 1990

SPECIFIC CONDITIONS:

5. Compliance tests for particulate matter and visible emissions shall be conducted concurrently.

B. No. 2 Extractor

1. The source may operate continuously (i.e., 8,760 hrs/yr).

2. The maximum total process input rate shall not exceed 450 lbs/hr and 1971 tons/yr of ground roasted coffee beans.

3. The maximum allowable particulate matter emissions from the extractor cyclone shall not exceed 1.4 lbs/hr and 6.2 tons/yr, based on F.A.C. Rule 17-2.610(1) and 450 lbs/hr processing rate of ground roasted coffee beans. For the extractor cyclone, initial and subsequent compliance tests shall be conducted using EPA Reference Method 5 in accordance with F.A.C. Rule 17-2.700 and 40 CFR 60, Appendix A, unless another methodology for compliance verification has been approved by the Department pursuant to F.A.C. Rule 17-2.700(3), ASP.

4. Visible emissions from the extractor cyclone shall be less than 20% opacity. For the initial and subsequent compliance tests, EPA Reference Method 9 shall be used to test the extractor cyclone in accordance with F.A.C. Rule 17-2.700 and 40 CFR 60, Appendix A. If a visible emissions standard is approved as an ASP for Specific Condition No. B.3. and is more stringent than the standard contained in this Specific Condition, then the more stringent standard shall be applicable for compliance verification.

5. Compliance tests for particulate matter and visible emissions shall be conducted concurrently.

C. Nos. 1 and 2 Extractors

1. The sources may operate continuously (i.e., 8,760 hrs/yr).

2. The maximum total process input rate shall not exceed 640 lbs/hr (No. 1) and 450 lbs/hr (No. 2) of ground roasted coffee beans.

3. Simultaneous extractor blows to the extractor cyclone are prohibited.

D. Roasted Coffee Bean Grinder

1. The roasted coffee bean grinder may operate continuously (i.e., 8,760 hrs/year).

PERMITTEE:
Lykes Pasco, Inc.

Permit No. AC 51-156207
Expiration Date: June 30, 1990

SPECIFIC CONDITIONS:

2. The roasted coffee bean grinder's maximum total process input rate shall not exceed 1090 lbs/hr and 4774.2 tons/yr of roasted coffee beans.

E. Four (4) Roasted Coffee Bean Storage Bins

1. The maximum storage capacity of each roasted coffee bean storage bin is 825 cubic feet or 10 tons of roasted coffee beans (at a density of 22-26 pounds per cubic foot).

F. General

1. The Department's Southwest District office shall be notified in writing at least 15 days prior to compliance testing. The test results shall be submitted to the Department's Southwest District office no later than 45 days after completion of the last test run.

2. The No. 2 Coffee Bean Line and associated appurtenances are subject to the applicable provisions of F.A.C Chapters 17-2 and 17-4.

3. The No. 2 Coffee Bean Line and associated appurtenances are subject to the provisions of F.A.C. Rules 17-2.240: Circumvention; 17-2.250: Excess Emissions; and, 17-4.130: Plant Operation-Problems.

4. Objectionable odors shall not be allowed off plant property.

5. The permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the BAQM prior to 60 days before the expiration of the permit (F.A.C. Rule 17-4.090).

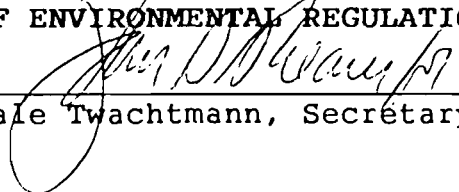
6. An application for an operation permit must be submitted to the Department's Southwest District office at least 90 days prior to the expiration date of this construction permit or within 45 days after completion of compliance testing, whichever occurs first. To properly apply for an operation permit, the applicant shall submit the appropriate application form, fee, certification that construction was completed noting any deviations from the conditions in the construction permit, and compliance test reports as required by this permit (F.A.C. Rule 17-4.220).

PERMITTEE:
Lykes Pasco, Inc.

Permit No. AC 51-156207
Expiration Date: June 30, 1990

Issued this 17th day
of August, 1989

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION


Dale Twachtmann, Secretary



State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

For Routing To Other Than The Addressee	
To: _____	Location: _____
To: _____	Location: _____
To: _____	Location: _____
From: _____	Date: _____

Interoffice Memorandum

TO: Dale Twachtmann

FROM: Steve Smallwood *by [Signature]*

DATE: August 17, 1989

SUBJ: Approval of Construction Permit No. AC 51-156207
Lykes Pasco, Inc.

Attached for your approval and signature is a permit prepared by Central Air Permitting for the above mentioned company to construct a new coffee bean roaster, cooler and extractor (No. 2 line) at their existing facility located on the east side of Highway 301 North, Dade City, Pasco County, Florida.

Comments were received from the company's consultant requesting an alternate standards procedure (ASP) for compliance verification. The ASP request is currently being reviewed by the Department. As a result of the ASP request, minor revisions were made to the proposed permit.

Day 90, after which the permit will be issued by default, is September 24, 1989.

I recommend your approval and signature.

SS/BM/t

attachments

RECEIVED

AUG 17 1989

Office of the Secretary

File Copy

PM
7-27-89
Dade City, FL



Lykes Pasco, Inc.
Post Office Box 97
Dade City, FL 34297-0097
Telephone: (904) 567-5211

RECEIVED
JUL 31 1989
DER-BAQM

July 26, 1989

Mr. Bill Thomas
Bureau of Air Quality Management
Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee FL 32399-2400

Dear Mr. Thomas:

Attached is the proof of publication of the intent to issue notice as required by our construction permit number AC51-156207, for the construction of a new coffee roaster/extractor line at the Lykes Pasco, Inc. facility in Dade City, Florida. If you have any questions concerning the publication of this legal notice please feel free to call me.

Sincerely,

LYKES PASCO, INC.

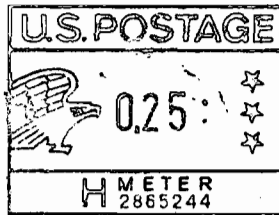
M. J. Mulholland
Quality Assurance Project Manager

MJM:mw

XC: N. W. Hunt
J. Koogler
H. Kearns - S.W. District - DER

Attachment

Bruce 7-31-89 RRM



THE TAMPA TRIBUNE

Published Daily
Tampa, Hillsborough County, Florida

JUL 26 1989

State of Florida
County of Hillsborough

ss.

Before the undersigned authority personally appeared
G. T. Gleason, who on oath says that he is Controller of The Tampa Tribune, a daily
newspaper published at Tampa in Hillsborough County, Florida; that the attached copy
of advertisement being a

LEGAL NOTICE

in the matter of STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL
REGULATION
NOTICE OF INTENT TO ISSUE

was published in said newspaper in the issues of

July 24, 1989

Affiant further says that the said The Tampa Tribune is a newspaper published at
Tampa, in said Hillsborough County, Florida, and that the said newspaper has
heretofore been continuously published in said Hillsborough County, Florida, each day
and has been entered as second class mail matter at the post office in Tampa, in said
Hillsborough County, Florida, for a period of one year next preceding the first publica-
tion of the attached copy of advertisement; and affiant further says that he 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.

G. T. Gleason

Sworn to and subscribed before me, this 24th day

July, A.D. 19 89

Janyu Poole

State of Florida
Department of
Environmental Regulation
Notice of Intent to Issue
The Department of Environ-
mental Regulation hereby
gives notice of its intent to
issue a permit to Lykes Pasco,
Inc., Post Office Box 97, Dade
City, Florida, 33525, to con-
struct/install a new coffee
bean roaster and extractor
line (No. 2) at the applicant's
existing facility located on the
east side of Highway 301
North, Dade City, Pasco Coun-
ty, Florida. A determination of
Best Available Control Tech-
nology (BACT) was not re-
quired. The Department is is-
suing this intent to issue for
the reasons stated in the Tech-
nical Evaluation and Prelimi-
nary Determination.

A person whose substantial
interests are affected by the
Department's proposed per-
mitting decision may petition
for an administrative proceed-
ing (hearing) in accordance
with Section 120.57, Florida
Statutes. The petition must
contain the information set
forth below and must be filed
(received) in the Office of Gen-
eral Counsel of the Depart-
ment at 2600 Blair Stone Road,
Tallahassee, Florida 32399-
2400, within fourteen (14) days
of publication of this notice.
Petitioner shall mail a copy of
the petition to the applicant at
the address indicated above
at the time of filing. Failure to
file a petition within this time
period shall constitute a waver
of any right such person
may have to request an admin-
istrative determination
(hearing) under Section 120.57,
Florida Statutes.

The Petition shall contain
the following information;

(a) The name, address, and
telephone number of each
petitioner, the applicant's
name and address, the Depart-
ment Permit File Number and
the county in which the pro-
ject is proposed;

(b) A statement of how and
when each petitioner received
notice of the Department's ac-
tion or proposed action;

(c) A statement of how each
petitioner's substantial
interests are affected by the
Department's action or pro-
posed action;

(d) A statement of the mate-
rial facts disputed by
Petitioner, if any;

(e) A statement of facts
which petitioner contends
warrant reversal or modifica-
tion of the Department's ac-
tion or proposed action;

(f) A statement of which
rules or statutes petitioner
contends require reversal or
modification of the Depart-
ment's action or proposed ac-
tion; and

(g) A statement of the relief
sought by petitioner, stating
precisely the action petitioner
wants the Department to take
with respect to the Depart-
ment's action or proposed ac-
tion.

If a petition is filed, the ad-
ministrative hearing process
is designed to formulate agen-
cy action. Accordingly, the
Department's final action may
be different from the position
taken by it in this Notice. Per-
sons whose substantial
interests will be affected by
any decision of the Depart-
ment with regard to the appli-
cation have the right to
petition to become a party to
the proceeding. The petition
must conform to the require-
ments specified above and be
filed (received) within 14 days
of publication of this notice in
the Office of General Counsel
at the above address of the
Department. Failure to
petition within the allowed
time frame constitutes waiver
of any right such person has
to request a hearing under
Section 120.57, F.S., and to par-
ticipate as a party to this pro-
ceeding. Any subsequent inter-
vention will only be at the ap-
proval of the presiding officer;
upon motion filed pursuant to
Rule 28-5.207, F.A.C.

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

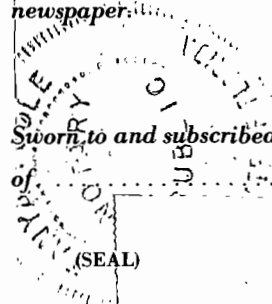
Department of
Environmental Regulation
Bureau of Air
Quality Management
2600 Blair Stone Road
Tallahassee,
Florida 32399-2400

Department of
Environmental Regulation
Southwest District Office
4520 Oak Fair Blvd.
Tampa, Florida 33610-7347

Any person may send writ-
ten comments on the pro-
posed action to Mr. Bill Thom-
as at the Department's Tallah-
hassee address. All comments
mailed within 14 days of the
publication of this notice will
be considered in the Depart-
ment's final determination.

3425 7/24/89

Notary Public, State of Florida
My Commission Expires Sept. 8, 1992
Bonded Thru Troy Fain - Insurance Inc.



PM
7-27-89
Dade City, FL



Lykes Pasco, Inc.
Post Office Box 97
Dade City, FL 34297-0097
Telephone: (904) 567-5211

RECEIVED

JUL 31 1989

DER-BAQM

July 26, 1989

Mr. Bill Thomas
Bureau of Air Quality Management
Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee FL 32399-2400

Dear Mr. Thomas:

Attached is the proof of publication of the intent to issue notice as required by our construction permit number AC51-156207, for the construction of a new coffee roaster/extractor line at the Lykes Pasco, Inc. facility in Dade City, Florida. If you have any questions concerning the publication of this legal notice please feel free to call me.

Sincerely,

LYKES PASCO, INC.

M. J. Mulholland
Quality Assurance Project Manager

MJM:mw

XC: N. W. Hunt
J. Koogler
H. Kearns - S.W. District - DER

Attachment

Bruce 7-31-89 RAL

THE TAMPA TRIBUNE

Published Daily
Tampa, Hillsborough County, Florida

JUL 26 1989

State of Florida }
County of Hillsborough } 66.

Before the undersigned authority personally appeared
G. T. Gleason, who on oath says that he is Controller of The Tampa Tribune, a daily
newspaper published at Tampa in Hillsborough County, Florida; that the attached copy
of advertisement being a

LEGAL NOTICE

in the matter of STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL
REGULATION
NOTICE OF INTENT TO ISSUE

was published in said newspaper in the issues of
July 24, 1989

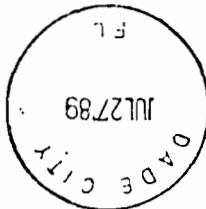
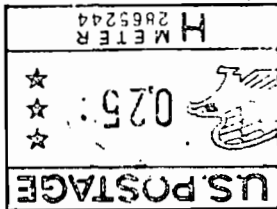
Affiant further says that the said The Tampa Tribune is a newspaper published at
Tampa, in said Hillsborough County, Florida, and that the said newspaper has
heretofore been continuously published in said Hillsborough County, Florida, each day
and has been entered as second class mail matter at the post office in Tampa, in said
Hillsborough County, Florida, for a period of one year next preceding the first publica-
tion of the attached copy of advertisement; and affiant further says that he 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.

G. T. Gleason

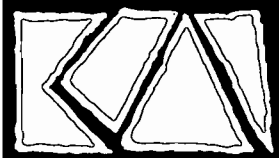
Sworn to and subscribed before me, this 24th day
of July, A.D. 19 89.

Janyu Poole

(SEAL)



Department of
Environmental Regulation
Notice of Intent to Issue
The Department of Environ-
mental Regulation hereby
gives notice of its intent to
issue a permit to Lykes Pasco,
Inc., Post Office Box 97, Dade
City, Florida, 33525, to con-
struct/install a new coffee
bean roaster and extractor
line (No. 2) at the applicant's
existing facility located on the
east side of Highway 301
North, Dade City, Pasco Coun-
ty, Florida. A determination of
Best Available Control Tech-
nology (BACT) was not re-
quired. The Department is is-
suing this intent to issue for
the reasons stated in the Tech-
nical Evaluation and Prelimi-
nary Determination.
A person whose substantial
interests are affected by the
Department's proposed per-
mitting decision may petition
for an administrative proceed-
ing (hearing) in accordance
with Section 120.57, Florida
Statutes. The petition must
contain the information set
forth below and must be filed
(received) in the Office of Gen-
eral Counsel at the Depart-
ment of 2600 Blair Stone Road,
Tallahassee, Florida 32399-
2400, within fourteen (14) days
of publication of this notice.
Petitioner shall mail a copy of
the petition to the applicant at
the address indicated above,
at the time of filing. Failure to
file a petition within this time
period shall constitute a waiver
of any right such person
may have to request an ad-
ministrative determination
(hearing) under Section 120.57,
Florida Statutes.
The Petition shall contain
the following information:
(a) The name, address, and
telephone number of each
petitioner, the applicant's
name and address, the Depart-
ment Permit File Number and
the county in which the pro-
ject is proposed;
(b) A statement of how and
when each petitioner received
notice of the Department's ac-
tion or proposed action;
(c) A statement of how each
petitioner's substantial
interests are affected by the
Department's action or pro-
posed action;
(d) A statement of the mate-
rial facts disputed by
Petitioner, if any;
(e) A statement of facts
which petitioner contends
warrant reversal or modifica-
tion of the Department's ac-
tion or proposed action;
(f) A statement of which
rules or statutes petitioner
contends require reversal or
modification of the Depart-
ment's action or proposed ac-
tion; and
(g) A statement of the relief
sought by petitioner, stating
precisely the action petitioner
wants the Department to take
with respect to the Depart-
ment's action or proposed ac-
tion.
If a petition is filed, the ad-
ministrative hearing process
is designed to formulate agency
action. Accordingly, the
Department's final action may
be different from the position
taken by it in this Notice. Per-
sons whose substantial
interests will be affected by
any decision of the Depart-
ment with regard to the appli-
cation have the right to
petition to become a party to
the proceeding. The petition
must conform to the require-
ments specified above and be
filed (received) within 14 days
of publication of this notice in
the Office of General Counsel
at the above address of the
Department. Failure to
petition within the allowed
time frame constitutes waiver
of any right such person has
to request a hearing under
Section 120.57, F.S., and to par-
ticipate as a party to this pro-
ceeding. Any subsequent inter-
vention will only be at the ap-
proval of the presiding officer
upon motion filed pursuant to
Rule 28-5.207, F.A.C.
The application is available
for public inspection during
normal business hours, 8:00
a.m. to 5:00 p.m., Monday
through Friday, except legal
holidays, at:
Department of
Environmental Regulation
Bureau of Air
Quality Management
2600 Blair Stone Road
Tallahassee,
Florida 32399-2400
Department of
Environmental Regulation
Southwest District Office
4520 Oak Fair Blvd.
Tampa, Florida 33610-7347
Any person may send writ-
ten comments on the pro-
posed action to Mr. Bill Thom-
as at the Department's Tal-
lahassee address. All comments
mailed within 14 days of the
publication of this notice will
be considered in the Depart-
ment's final determination.
3425 7/24/89



KOGLER & ASSOCIATES

ENVIRONMENTAL SERVICES

4014 NW THIRTEENTH STREET
GAINESVILLE, FLORIDA 32609
904/377-5822 • FAX 377-7158

KA 207-88-02

July 27, 1989

RECEIVED

JUL 28 1989

DER-BAQM

Mr. C. H. Fancy
Bureau of Air Quality Management
Florida Department of
Environmental Regulation
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Subject: Lykes Pasco, Inc.
Request for Permit Modification
Correction to Letter Dated July 26, 1989

Dear Mr. Fancy:

In reference to my letter to you dated July 26, 1989, I would like to correct a typographical error that appeared on Page 2, Paragraph 2. In the subject letter, I have requested that "...demonstration of compliance with the particulate matter emission limiting standard for the chaff cyclone and cooler cyclone be demonstrated by maintaining the opacity of emissions from the cyclones at five percent or less as determined by EPA Method 5". This sentence should be corrected to read "...EPA Method 9".

Please substitute yesterday's letter of request, dated July 26, 1989, for the enclosed corrected letter of request, dated July 27, 1989. I apologize for any inconvenience this might cause your office, but feel that a corrected letter is the best way to ensure that our request for EPA Method 9 determinations receives your complete consideration.

If you have any questions or if I could provide you with additional information, please do not hesitate to give me a call.

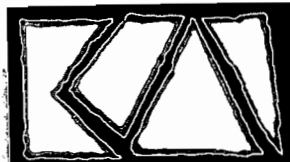
Very truly yours,

KOGLER & ASSOCIATES

John B. Koogler, Ph.D., P.E.

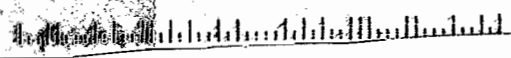
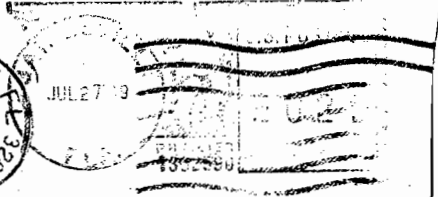
JBK:mab

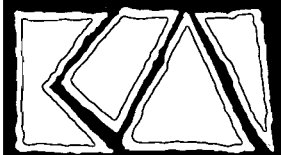
cc: Mr. Bruce Mitchell, FDER-Tallahassee
Mr. Mike Mulholland, Lykes Pasco



KOOGLER & ASSOCIATES
ENVIRONMENTAL SERVICES
4074 NW THIRTEENTH STREET
GAINESVILLE, FLORIDA 32609

Mr. C.H. Fancy
Bureau of Air Quality Management
Florida Department of
Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400





KOGLER & ASSOCIATES
ENVIRONMENTAL SERVICES

4014 NW THIRTEENTH STREET
GAINESVILLE, FLORIDA 32609
904/377-5822 ■ FAX 377-7158

KA 207-88-02

July 27, 1989

Mr. C. H. Fancy
Bureau of Air Quality Management
Florida Department of
Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Subject: Lykes Pasco, Inc.
Permit AC51-156207
No. 2 Coffee Line
Request for Permit Modification
Correction to Letter Dated July 26, 1989

Dear Mr. Fancy:

Under copy of a letter dated July 12, 1989, I received a copy of the Technical Evaluation and Preliminary Determination and proposed permit for the subject coffee line which is to be installed at the Lykes Pasco plant in Dade City, Florida. I spoke with Lykes Pasco about the permit conditions and we would like to review two of the permit conditions with you; Specific Conditions A3 and B3. These conditions relate to compliance testing.

Condition A3 requires that particulate matter emission measurements be conducted using EPA Method 5 to demonstrate compliance with the particulate matter emission limit for the chaff cyclone and cooler cyclone and Condition B3 requires similar testing to demonstrate compliance with the particulate matter emission limit for the extractor cyclone.

I spoke with Lykes Pasco personnel after receiving the draft permit and they expressed concern regarding the compliance test because of the physical difficulty in getting to the emission points and because of the fact that stacks with the necessary sampling ports were not planned for any of the three cyclones.

Mr. C.H. Fancy
Re: Lykes Pasco, Inc.

July 27, 1989
Page 2


I also spoke with Bruce Mitchell of your staff while I was in Tallahassee on July 20, 1989, regarding this matter. Mr. Mitchell stated that he would have preferred to have applied an Alternative Sampling Procedure consisting of visible emission observations with a five percent opacity limit as the means of demonstrating compliance for the three cyclones. He stated that he did not apply this procedure as it was not requested by the applicant.

After having discussed this matter with Lykes Pasco, I am hereby requesting that demonstration of compliance with the particulate matter emission limiting standard for the chaff cyclone and cooler cyclone be demonstrated by maintaining the opacity of emissions from the cyclones at five percent or less as determined by EPA Method 9. This request will require a modification to Specific Condition A3. I am also requesting that compliance with the particulate matter emission limiting standard for the extractor cyclone (Specific Condition B3) be demonstrated by maintaining the opacity of emissions from this cyclone at five percent or less as determined by EPA Method 9.

I appreciate your consideration of both of these matters and will be happy to provide any additional information should it be required.

Very truly yours,

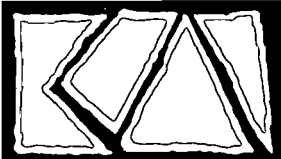
KOGLER & ASSOCIATES


John B. Koogler, Ph.D, P.E.

JBK:wa

cc: Mr. Bruce Mitchell, FDER-Tallahassee
Mr. Mike Mulholland, Lykes Pasco





KOOGLER & ASSOCIATES
ENVIRONMENTAL SERVICES
4014 NW THIRTEENTH STREET
GAINESVILLE, FLORIDA 32609
904/377-5822 • FAX 377-7158

RECEIVED

JUL 27 1989

DER - BAQM

KA 207-88-02

July 26, 1989

Mr. C. H. Fancy
Bureau of Air Quality Management
Florida Department of
Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

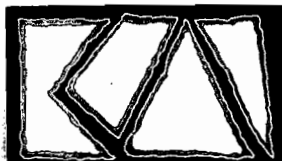
Subject: Lykes Pasco, Inc.
Permit AC51-156207
No. 2 Coffee Line
Request for Permit Modification

Dear Mr. Fancy:

Under copy of a letter dated July 12, 1989, I received a copy of the Technical Evaluation and Preliminary Determination and proposed permit for the subject coffee line which is to be installed at the Lykes Pasco plant in Dade City, Florida. I spoke with Lykes Pasco about the permit conditions and we would like to review two of the permit conditions with you; Specific Conditions A3 and B3. These conditions relate to compliance testing.

Condition A3 requires that particulate matter emission measurements be conducted using EPA Method 5 to demonstrate compliance with the particulate matter emission limit for the chaff cyclone and cooler cyclone and Condition B3 requires similar testing to demonstrate compliance with the particulate matter emission limit for the extractor cyclone.

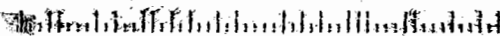
I spoke with Lykes Pasco personnel after receiving the draft permit and they expressed concern regarding the compliance test because of the physical difficulty in getting to the emission points and because of the fact that stacks with the necessary sampling ports were not planned for any of the three cyclones.



KOGLER & ASSOCIATES
ENVIRONMENTAL SERVICES
4014 NW THIRTEENTH STREET
GAINESVILLE, FLORIDA 32609



Mr. C.H. Fancy
Bureau of Air Quality Management
Florida Department of
Environmental Regulation
2600 Blair Stone Road
Tallahassee, FL 32399-2400



Mr. C.H. Fancy
Re: Lykes Pasco, Inc.

July 26, 1989
Page 2

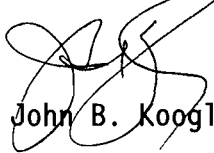
I also spoke with Bruce Mitchell of your staff while I was in Tallahassee on July 20, 1989, regarding this matter. Mr. Mitchell stated that he would have preferred to have applied an Alternative Sampling Procedure consisting of visible emission observations with a five percent opacity limit as the means of demonstrating compliance for the three cyclones. He stated that he did not apply this procedure as it was not requested by the applicant.

After having discussed this matter with Lykes Pasco, I am hereby requesting that demonstration of compliance with the particulate matter emission limiting standard for the chaff cyclone and cooler cyclone be demonstrated by maintaining the opacity of emissions from the cyclones at five percent or less as determined by EPA Method 5. This request will require a modification to Specific Condition A3. I am also requesting that compliance with the particulate matter emission limiting standard for the extractor cyclone (Specific Condition B3) be demonstrated by maintaining the opacity of emissions from this cyclone at five percent or less as determined by EPA Method 9.

I appreciate your consideration of both of these matters and will be happy to provide any additional information should it be required.

Very truly yours,

KOGLER & ASSOCIATES



John B. Koogler, Ph.D, P.E.

JBK:wa

cc: Mr. Bruce Mitchell, FDER-Tallahassee
Mr. Mike Mulholland, Lykes Pasco



7-20-89
3:25-136

Dr. John Koogler

Re: Lykes Pasco, Inc.

Will request a 5% Opacity (NO VE) in lieu
of compliance testing cycles.

Ran

attendees: John Koogler

Bill Thomas

SENDER: Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.
 Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. Show to whom delivered, date, and addressee's address. (Extra charge) 2. Restricted Delivery (Extra charge)

3. Article Addressed to: Norvell W. Hunt, Dir. of Tech Ser Lykes Pasco, Inc. P.O. Box 97 Dade City, FL 33525	4. Article Number P 938 762 615
	Type of Service: <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise
	Always obtain signature of addressee or agent and DATE DELIVERED .
5. Signature -- Address X	8. Addressee's Address (ONLY if requested and fee paid)
6. Signature -- Agent X <i>[Signature]</i>	
7. Date of Delivery 7/13/89	

PS Form 3811, Mar. 1988 * U.S.G.P.O. 1988-212-865 DOMESTIC RETURN RECEIPT

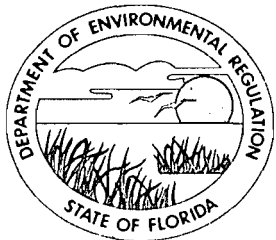
P 938 762 615

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
 NOT FOR INTERNATIONAL MAIL
 (See Reverse)

Return to Norvell W. Hunt, Dir. of Tech	
Services	
Street and No. Lykes Pasco, Inc.	
P.O. Box 97 Code Dade City, FL 33525	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date mailed: 7/11/89 AC 51-156207	

PS Form 3800, June 1985



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

July 11, 1989

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Mr. Norvell W. Hunt
Director of Technical Services
Lykes Pasco, Inc.
Post Office Box 97
Dade City, Florida 33525

Dear Mr. Hunt:

Attached is one copy of the Technical Evaluation and Preliminary Determination and proposed permit for Lykes Pasco, Inc. to construct/install a new coffee bean roaster and extractor line (No. 2) at the applicant's existing facility located on the east side of Highway 301 North, Dade City, Pasco County, Florida.

Please submit any written comments you wish to have considered concerning the Department's proposed action to Mr. Bill Thomas of the Bureau of Air Quality Management.

Sincerely,

C. H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality
Management

CHF/kt

Attachments

cc: H. Kerns, SW District
J. Koogler, P.E., K & A

Reading File }
Bruce Mitchell } 7-11-89 RAL

BEFORE THE STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

In the Matter of
Application for Permit by:

Lykes Pasco, Inc.
P. O. Box 97
Dade City, FL 33525

DER File No. AC 51-156207

INTENT TO ISSUE

The Department of Environmental Regulation hereby gives notice of its intent to issue a permit (copy attached) for the proposed project as detailed in the application specified above. The Department is issuing this Intent to Issue for the reasons stated in the attached Technical Evaluation and Preliminary Determination.

The applicant, Lykes Pasco, Inc., applied on October 10, 1988, to the Department of Environmental Regulation for a permit to construct/install a new coffee bean roaster and extractor line (No. 2) at the applicant's existing facility located on the east side of Highway 301 North, Dade City, Pasco County, Florida.

The Department has permitting jurisdiction under Chapter 403, Florida Statutes, and Florida Administrative Code Rules 17-2 and 17-4. The project is not exempt from permitting procedures. The Department has determined that an air construction permit is required for the proposed work.

Pursuant to Section 403.815, F.S. and DER Rule 17-103.150, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Notice of Intent to Issue Permit. The notice shall be published one time only within 30 days, in the legal ad section of a newspaper of general circulation in the area affected. For the purpose of this rule, "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. The applicant shall provide proof of publication to the Department, at the address specified within seven days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit.

The Department will issue the permit with the attached conditions unless a petition for an administrative proceeding (hearing) is filed pursuant to the provisions of Section 120.57, F.S.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, 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 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Petitions filed by the permit applicant and the parties listed below must be filed within 14 days of receipt of this intent. Petitions filed by other persons must be filed within 14 days of publication of the public notice or within 14 days of receipt of this intent, whichever first occurs. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

The Petition shall contain the following information;

(a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;

(b) A statement of how and when each petitioner received notice of the Department's action or proposed action;

(c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;

(d) A statement of the material facts disputed by Petitioner, if any;

(e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;

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

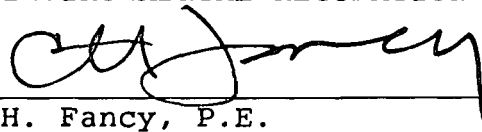
(g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, 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 decision of the Department with regard to the applicant have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of publication of this notice in the Office in General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such

person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION



C. H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality
Management

Copies furnished to:

N. Hunt, LPI
H. Kerns, SW District
J. Koogler, P.E., K & A

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this NOTICE OF INTENT TO ISSUE and all copies were mailed before the close of business on 7-11-89.

FILING AND ACKNOWLEDGEMENT
FILED, on this date, pursuant to
§120.52(9), Florida Statutes, with
the designated Department Clerk,
receipt of which is hereby
acknowledged.

Martha J. Wise
Clerk

7-11-89
Date

State of Florida
Department of Environmental Regulation
Notice of Intent to Issue

The Department of Environmental Regulation hereby gives notice of its intent to issue a permit to Lykes Pasco, Inc., Post Office Box 97, Dade City, Florida, 33525, to construct/install a new coffee bean roaster and extractor line (No. 2) at the applicant's existing facility located on the east side of Highway 301 North, Dade City, Pasco County, Florida. A determination of Best Available Control Technology (BACT) was not required. The Department is issuing this Intent to Issue for the reasons stated in the Technical Evaluation and Preliminary Determination.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, 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 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within fourteen (14) days of publication of this notice. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

The Petition shall contain the following information;

- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;
- (d) A statement of the material facts disputed by Petitioner, if any;
- (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;
- (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and
- (g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, 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 decision of the Department with regard to the application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of publication of this notice in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

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

Department of Environmental Regulation
Bureau of Air Quality Management
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Department of Environmental Regulation
Southwest District Office
4520 Oak Fair Blvd.
Tampa, Florida 33610-7347

Any person may send written comments on the proposed action to Mr. Bill Thomas at the Department's Tallahassee address. All comments mailed within 14 days of the publication of this notice will be considered in the Department's final determination.

Technical Evaluation
and
Preliminary Determination

Lykes Pasco, Inc.
Pasco County
Dade City, Florida

Construction Permit No. AC 51-156207

Florida Department of Environmental Regulation
Division of Air Resources Management
Bureau of Air Quality Management
Central Air Permitting

July 11, 1989

I. Application

A. Applicant

Lykes Pasco, Inc.
P. O. Box 97
Dade City, Florida 33525

B. Project Description and Location

The applicant intends to construct/install a new coffee bean roaster and extractor line (No. 2) at the applicant's existing facility located on the east side of Highway 301 North, Dade City, Pasco County, Florida.

The UTM coordinates are Zone 17, 383.5 km East and 3139.2 km North.

C. Process and Controls

The proposed new green coffee bean roaster (No. 2) will be a 300 pound batch unit and capable of 2.5 batches per hour, which is the same rate as the existing No. 1 roaster. The new roaster will be direct-fired with natural gas at a maximum of 1000 cf/hr (1 MMBtu/hr heat input). During the roasting cycle, a new chaff cyclone collection system will be constructed/installed to control emissions of particulate matter (PM) and visible emissions (VE). Estimated collection efficiency is 66 percent (consultant). Besides PM emissions and VE, the gas stream discharged from the roaster includes the products of combustion, aldehydes and organics.

At the end of a roasting cycle, the roasted coffee beans will be pneumatically conveyed to a new bean cooler (No. 2), which is a cyclonic device. The new bean cooler will have a maximum through-put rate of 640 lbs/hr, the same rate as the existing No. 1 bean cooler. The gas stream discharged includes emissions of PM and visible emissions.

From the bottom of the roasted bean cooler, which will be an inclined chute, the beans will be transferred to a new stoner bin via the incline chute and an air-lift leg. The light-weighted beans will be lifted up in the leg and the heavy debris and stones will remain at the bottom of the leg, which will be periodically removed. The stoner bin will have a maximum through-put rate of 640 lbs/hr, which is the same rate as the existing No. 1 stoner bin. The gas stream will be discharged through vents in the stoner bin and emissions are projected to be negligible.

The roasted coffee beans will then be transferred to the existing roasted bean storage bins (4), which have an associated blender system. Each existing roasted coffee bean storage bin has a maximum storage capacity of 825 cubic feet (10 tons at a density of 22-26 pounds per cubic foot). The existing roasted coffee bean blender will discharge a predetermined quantity of roasted coffee beans from one or more of the four roasted bean storage bins and will support both the Nos. 1 (existing) and 2 (new) extractors.

From the blender, the beans will be ground in the existing roasted coffee bean grinder and transferred to the existing No. 1 extractor line and/or the new No. 2 extractor line, which will consist of six vessels connected in series. In the vessels, the coffee will be extracted from the ground roasted coffee beans under elevated temperature and pressure. The existing No. 1 extractor line has a maximum processing capacity of 640 lbs/hr and the new extractor line (No. 2) will have a maximum processing capacity of 450 lbs/hr.

The existing roasted coffee bean grinder has a grinding capacity of 1800 lbs/hr. The grinder will be limited to a maximum grinding rate of 1090 lbs/hr, the total of the maximum processing rate for the existing No. 1 extractor and the No. 2 extractor.

At the end of the extraction cycle, the coffee concentrate will be withdrawn and the final extractor will be opened to expel the grounds. The grounds and steam will be discharged through an existing cyclone separator. The grounds will be retained in the separator hopper for subsequent collection and on-site disposal. The steam will be discharged into the atmosphere.

D. General

The Source Classification Codes are:

- o Coffee Roasting - 2095:

1)	3-02-002-01	Direct Fired Roaster	Tons Green Beans
2)	3-02-002-03	Stoner/Cooler	Tons Green Beans
3)	3-02-002-99	Extractor	Tons Product

- o Food and Agriculture-Fuel Fired Equipment

1)	3-02-900-3	Process Heaters-Natural Gas	10 ⁶ ft ³ Burned
----	------------	-----------------------------	--

II. Rule Applicability

The proposed modification is subject to preconstruction review under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code (F.A.C.) Chapters 17-2 and 17-4.

The application package was deemed complete on May 25, 1989.

The existing facility is located in an area designated attainment for all pollutants.

Since the facility is not one of those contained in Table 500-1, F.A.C. Chapter 17-2, the pollutant threshold for triggering new source review pursuant to F.A.C. Rule 17-2.500(5) is 250 TPY.

The following table presents the existing facility's allowable pollutant emissions in tons per year (TPY):

Table 1

Source/ Permit # AO 51-	Operating Hrs.	Allowable PM	Pollutant SO ₂	Emissions (TPY) NO _x	CO	VOC
1. 152577	4896	139	242	45		
2. 152578	4896	69	471	37		
3. 129456	8760	4	<1	105	26	>1
4. 129457	8760	2	<1	57	14	>1
5. 129458	5040	5	<1	149	37	>1
6. CPD#D-3	4896	15				
7. CPD#D-4	4896	15				
8. CPD#D-5	4896	15				
9. 152582	4896	15				
10. 152583	4896	15				
11. CPD#D-8	4896	15				
12. 152585	4896	15				
13. CPD#D-10	4896	15				
14. CPD#D-11	4896	15				
15. 152588	4896	15				
16. 152589	4896	15				
17. CPD#D-14	4896	15				
18. CPD#D-15	4896	15				
19. CPD#D-16	4896	15				
20. CPD#D-17	4896	15				
21. 152594	4896	15				
22. 149866	8760	15				
23. 115788	8760	9				
24. 115788	8760	17				
25. 115790	8760	17				
26. 115791	8760	17				
27. 136667	2000					6
Total:		536	716	393	77	9

Note: o Based on APIS printout.
o CPD - citrus peel dryer

The following table presents the projected potential pollutant emissions from the proposed modification in TPY:

Table 2

Source	Potential Pollutant Emissions (TPY)			
	PM	NOx	Aldehydes	Organics
Roaster No. 2	8.5	0.2	0.3	1.3
Extractor No. 2	6.2			
Total:	14.7	0.2	0.3	1.3

- Note:
- o Hours of operation at 8,760
 - o Pollutant emissions based on:
 1. PM - F.A.C. Rule 17-2.610(1)
 - a. Roaster - 750 lbs/hr input rate
 - b. Extractor - 450 lbs/hr input rate
 2. NOx - Table 6.2-1, AP-42, Vol. 1 4th ed.
 - a. Roaster - 0.1 lb/ton
 3. Aldehydes - Table 6.2-1, AP-42, Vol. 1, 4th ed.
 - a. Roaster - 0.2 lb/ton
 4. Organic acids - Table 6.2-1, AP-42, 4th ed.
 - a. Roaster - 0.9 lb/ton

Based on Tables 1 and 2, the proposed project is a minor modification to a major facility and the potential emissions are not subject to new source review pursuant to F.A.C. Rule 17-2.500, Prevention of Significant Deterioration (PSD). Therefore, review of the potential pollutant emissions shall be in accordance with F.A.C. Rule 17-2.520, Sources Not Subject to PSD or Nonattainment Requirements.

The existing grinder, blender, and four (4) roasted coffee bean storage bins are capable of accommodating additional line production increases without a physical modification. Based on this and U.S. EPA's letter of August 15, 1983, relating to de minimis modifications, the Department will review subsequent modifications to the existing coffee bean processing facility as if it had never been constructed in accordance with F.A.C. Rule 17-2.500, PSD.

Since there are no specific emission limiting standards contained in F.A.C. Rules 17-2.600 and 17-2.660, the roaster and extractor are subject to the provisions of F.A.C. Rule 17-2.610, General Particulate Emission Limiting Standards.

The proposed project is subject to the provisions of F.A.C. Rule 17-2.620(2), General Pollutant Emission Limiting Standards-Objectionable Odor Prohibited.

The proposed project is subject to the provisions of F.A.C. Rules 17-2.240: Circumvention; 17-2.250: Excess Emissions; and, 17-4.130: Plant Operation-Problems. Also, the proposed project is subject to the applicable provisions of F.A.C. Chapters 17-2 and 17-4.

III. Summary of Emissions of Air Quality Analysis

A. Emission Limitations

Limitations of PM and visible emissions are applicable to the following sources/operations:

Table 3

Source	Allowable Emission Limitations	
Roaster	PM	2.0 lbs/hr; 8.5 TPY (total)
	VE	less than 20 percent opacity (2 points)
Extractor	PM	1.4 lbs/hr; 6.2 TPY
	VE	less than 20 percent opacity

Note: o Hours of operation at 8760 hrs/yr.

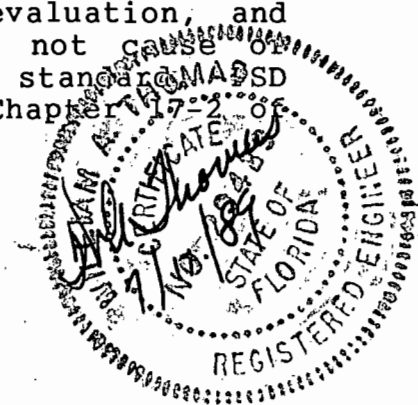
- o The PM emissions from the roaster reflect the total emissions from the chaff cyclone and the "cooler," which is also a cyclone device; and, in accordance with F.A.C. Rule 17-2.610(1) and a maximum processing rate of 750 lbs/hr of coffee beans.

B. Air Quality Analysis

From a review of the application package and supplemental information, and air quality analysis was not required.

IV. Conclusion

Based on the information provided by Lykes Pasco, Inc., the Department has reasonable assurance that the proposed construction/installation of a new coffee bean roaster and extractor line (No. 2), as described in this evaluation, and subject to the conditions proposed herein, will not contribute to a violation of any air quality standard or increment, or any other technical provision of Chapter 17-2 of the Florida Administrative Code.





Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

PERMITTEE:
Lykes Pasco, Inc.
P. O. Box 97
Dade City, Florida 33525

Permit Number: AC 51-156207
Expiration Date: June 30, 1990
County: Pasco
Latitude/Longitude: 28°22'32"N
82°11'20"W

Project: No. 2 Coffee Bean
Line: Roaster and Extractor
and Associated Appurtenances

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code (F.A.C.) Chapters 17-2 and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

For the construction/installation of a new coffee bean line (No. 2), consisting of a coffee bean roaster, extractor, and associated appurtenances. The roaster will have two emission points, a chaff cyclone system and a "cooler," which is a cyclone system. The No. 2 extractor will use the existing cyclone system associated with the existing No. 1 extractor. The No. 2 line will also utilize other equipment that is existing and mutual to the two lines, Nos. 1 and 2, which are the roasted coffee bean storage bins (4), the blender and the grinder. The project will take place at the permittee's existing facility located on Highway 301 North in Dade City, Florida. The UTM coordinates are Zone 17, 383.5 km East and 3139.2 km North.

The Source Classification Codes are:

1. Coffee Roasting - 2095:
 - o 3-02-002-02 Direct Fired Roaster Tons Green Beans ^{coffee}
 - o 3-02-002-03 Stoner/Cooler Tons Green Beans
 - o 3-02-002-99 Extractor Tons Product
2. Food and Agriculture-Fuel Fired Equipment
 - o 3-02-900-3 Process Heaters-Natural Gas 10⁶ ft³ Burned

The sources shall be in accordance with the permit application, plans, documents, amendments and drawings, except as otherwise noted in the General and Specific Conditions.

Attachments are listed below:

1. Application to Construct Air Pollution Sources, DER Form 17-1.202(16), received October 10, 1988.
2. Mr. C. H. Fancy's letter dated November 16, 1988.
3. Dr. John B. Koogler's letter with enclosure received November 23, 1988.

PERMITTEE:
Lykes Pasco, Inc.

Permit No. AC 51-156207
Expiration Date: June 30, 1990

Attachments Continued:

4. Mr. C. H. Fancy's letter dated December 22, 1988.
5. Dr. John B. Koogler's letter received February 20, 1989.
6. Mr. C. H. Fancy's letter dated March 24, 1989.
7. Dr. John B. Koogler's letter received May 25, 1989.
8. Mr. James T. Wilburn's letter dated August 15, 1983.
9. Technical Evaluation and Preliminary Determination dated July 11, 1989.

GENERAL CONDITIONS:

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.

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

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

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

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.

PERMITTEE:
Lykes Pasco, Inc.

Permit No. AC 51-156207
Expiration Date: June 30, 1990

GENERAL CONDITIONS:

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.

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 any 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.

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.

PERMITTEE:
Lykes Pasco, Inc.

Permit No. AC 51-156207
Expiration Date: June 30, 1990

GENERAL CONDITIONS:

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.

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 proscribed 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.

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.

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 17-4.120 and 17-30.300, 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.

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

13. This permit also constitutes:

- () Determination of Best Available Control Technology (BACT)
- () Determination of Prevention of Significant Deterioration (PSD)
- () Compliance with New Source Performance Standards

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.

PERMITTEE:
Lykes Pasco, Inc.

Permit No. AC 51-156207
Expiration Date: June 30, 1990

GENERAL CONDITIONS:

- 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 for 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:
 - the date, exact place, and time of sampling or measurements;
 - the person responsible for performing the sampling or measurements;
 - the dates analyses were performed;
 - the person responsible for performing the analyses;
 - the analytical techniques or methods used; and
 - the results of such analyses.

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.

SPECIFIC CONDITIONS:

A. No. 2 Coffee Bean Roaster

1. The source may operate continuously (i.e., 8,760 hrs/year).
2. The maximum total process input rate shall not exceed 750 lbs/hr and 3285 tons/yr of green coffee beans, which is based on a maximum total process input rate of 300 lbs/batch of green coffee beans and 2.5 batches/hr.
3. The maximum total allowable particulate matter emissions from the chaff cyclone and cooler cyclone shall not exceed 2.0 lbs/hr and 8.5 tons/yr, based on F.A.C. Rule 17-2.610(1) and 750 lbs/hr processing rate of green coffee beans. EPA Reference Method 5 shall be used to test the chaff and cooler cyclones in accordance with F.A.C. Rule 17-2.700 and 40 CFR 60, Appendix A.

PERMITTEE:
Lykes Pasco, Inc.

Permit No. AC 51-156207
Expiration Date: June 30, 1990

SPECIFIC CONDITIONS:

4. Visible emissions from the chaff and cooler cyclones shall be less than 20% opacity. EPA Reference Method 9 shall be used to test the chaff and cooler cyclones in accordance with F.A.C. Rule 17-2.700 and 40 CFR 60, Appendix A.

5. Compliance tests for particulate matter and visible emissions shall be conducted concurrently.

B. No. 2 Extractor

1. The source may operate continuously (i.e., 8,760 hrs/yr).

2. The maximum total process input rate shall not exceed 450 lbs/hr and 1971 tons/yr of ground roasted coffee beans.

3. The maximum allowable particulate matter emissions from the extractor cyclone shall not exceed 1.4 lbs/hr and 6.2 tons/yr, based on F.A.C. Rule 17-2.610(1) and 450 lbs/hr processing rate of ground roasted coffee beans. EPA Reference Method 5 shall be used to test the extractor cyclone in accordance with F.A.C. Rule 17-2.700 and 40 CFR 60, Appendix A.

4. Visible emissions from the extractor cyclone shall be less than 20% opacity. EPA Reference Method 9 shall be used to test the extractor cyclone in accordance with F.A.C. Rule 17-2.700 and 40 CFR 60, Appendix A.

5. Compliance tests for particulate matter and visible emissions shall be conducted concurrently.

C. Nos. 1 and 2 Extractors

1. The sources may operate continuously (i.e., 8,760 hrs/yr).

2. The maximum total process input rate shall not exceed 640 lbs/hr (No. 1) and 450 lbs/hr (No. 2) of ground roasted coffee beans.

3. Simultaneous extractor blows to the extractor cyclone are prohibited.

D. Roasted Coffee Bean Grinder

1. The roasted coffee bean grinder may operate continuously (i.e., 8,760 hrs/year).

PERMITTEE:
Lykes Pasco, Inc.

Permit No. AC 51-156207
Expiration Date: June 30, 1990

SPECIFIC CONDITIONS:

2. The roasted coffee bean grinder's maximum total process input rate shall not exceed 1090 lbs/hr and 4774.2 tons/yr of roasted coffee beans.

E. Four (4) Roasted Coffee Bean Storage Bins

1. The maximum storage capacity of each roasted coffee bean storage bin is 825 cubic feet or 10 tons of roasted coffee beans (at a density of 22-26 pounds per cubic foot).

F. General

1. The Department's Southwest District office shall be notified in writing at least 15 days prior to compliance testing. The test results shall be submitted to the Department's Southwest District office no later than 45 days after completion of the last test run.

2. The No. 2 Coffee Bean Line and associated appurtenances are subject to the applicable provisions of F.A.C Chapters 17-2 and 17-4.

3. The No. 2 Coffee Bean Line and associated appurtenances are subject to the provisions of F.A.C. Rules 17-2.240: Circumvention; 17-2.250: Excess Emissions; and, 17-4.130: Plant Operation-Problems.

4. Objectionable odors shall not be allowed off plant property.

5. The permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the BAQM prior to 60 days before the expiration of the permit (F.A.C. Rule 17-4.090).

6. An application for an operation permit must be submitted to the Department's Southwest District office at least 90 days prior to the expiration date of this construction permit or within 45 days after completion of compliance testing, whichever occurs first. To properly apply for an operation permit, the applicant shall submit the appropriate application form, fee, certification that construction was completed noting any deviations from the conditions in the construction permit, and compliance test reports as required by this permit (F.A.C. Rule 17-4.220).

PERMITTEE:
Lykes Pasco, Inc.

Permit No. AC 51-156207
Expiration Date: June 30, 1990

Issued this _____ day
of _____, 1989

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

Dale Twachtman, Secretary

ATTACHMENTS 1 - 7
Available Upon Request

ATTACHMENT 8



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET
ATLANTA, GEORGIA 30365

4AW-AM

AUG 15 1983

Mr. Harold E. Hodges, P.E., Director
Division of Air Pollution Control
Tennessee Department of Public Health
150 Nineth Avenue North
Nashville, Tennessee 37203

Dear Mr. Hodges:

This is in answer to a request made by Angie Pitcock to Roger Pfaff by telephone on July 21, regarding EPA's policy on accumulation of de minimis increases in emissions at major stationary sources.

As you know, EPA interprets the PSD and nonattainment new source review rules (40CFR 51.24, 40CFR 52.21, 40CFR 51 Appendix S, 40 CFR 51.18 (j), 40CFR 52.24) as allowing an unlimited number of de minimis increases at major stationary sources without subjecting the source to review. This policy is stated in a memorandum from Edward E. Reich to Charles Whitmore, January 22, 1981, and is further confirmed in EPA's June 2, 1983 summary of applicability determinations (PSD-138).

Although the policy outlined in these documents allows a series of de minimis modifications to escape review, it is important that the reviewing agency not allow a source owner to circumvent the regulations by splitting up what would normally be considered a single major modification into two or more de minimis increases. Two or more increases should be considered by the reviewing agency to be part of the same project if they are considered part of the same project in the corporate planning of the source owner or if the emission units being constructed or modified are interdependent. For example, if the company institutes a "debottlenecking" project or a plant-wide energy conservation project involving several independent facilities, the project should be considered to be a single modification. If a company constructs a new boiler to generate steam and also adds new steam-using equipment, such as an evaporator, these units should also be considered part of the same project.

In order to facilitate agency decisions regarding whether two or more increases constitute a single project, EPA Region IV is adopting a policy which allows an initial presumption based upon easily distinguishable criteria, with allowance for rebuttal of the presumption by the applicant. Region IV policy is to consider two or more increases as a single project if the permit application for the last increase is submitted before the first increase is operational. This is a reasonable dividing line because it is easily discernible and because it would prohibit two facilities from being considered separate projects if one could not operate without the other.

For example, suppose a company obtains a permit for a new boiler at a major source in an attainment area on June 1, 1983. The new boiler emits 30 tons per year of SO₂ and escapes PSD review as a de minimis increase. On October 1, 1983, while the first boiler is under construction, the company submits an application for a second, identical, boiler. The agency would initially presume that these two boilers were part of a single project causing a significant increase in SO₂. Both boilers would be subject to PSD, including retroactive BACT for the first boiler. However, if the company could show, through engineering analysis and internal documents, that the two boilers were planned during separate time frames and involve separate, independent facilities (such as separate product lines at a large chemical plant), the agency could allow the boilers to be treated as separate projects. Conversely, if you know that two actions are actually one project, but the source owner is able to build and operate the first one before applying for the second, solely to avoid review, you should use that knowledge to subject the project to review.

The initial presumption criteria are used for the purpose of simplifying your decision process for the more obvious cases. The final criteria should always be whether or not the source owner is circumventing the new source review rules by separating what would normally be considered one project into two or more projects.

Sincerely yours,

James T. Wilburn, Chief
Air Management Branch
Air and Waste Management Division

cc: Ed Reich
Mike Trutna
All state agencies

7-7-89
Cindy W SW Diet

A051-136667

Pat
↓
Drs Booth

6.2 lbs
6.2 TPy
2000

PM
5-25-89
Gainesville, FL

Main File C67



KOUGLER & ASSOCIATES
ENVIRONMENTAL SERVICES
4014 NW THIRTEENTH STREET
GAINESVILLE, FLORIDA 32609
904/377-5822 • FAX 377-7158

KA 207-88-02

May 25, 1989

RECEIVED
MAY 26 1989
DER-BAQM

Mr. C. H. Fancy
Division of Air Resources
Management
Florida Department of
Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Subject: Lykes Pasco, Inc.
Supplemental Information for Coffee Roaster
Construction Permit Application
Permit AC51-156207

Dear Clair:

The following information is provided in response to your letter dated March 24, 1989.

1. Please identify and provide the maximum design and installed processing rates/capacities or storage capacities for all the processing equipment (i.e., blender, grinder, storage bins, etc.) that are to be mutual to both the existing line No. 1 and the proposed new line No. 2.

There are four roasted coffee bean storage bins that will be used by the two coffee lines. Each storage bin has a capacity of 825 cubic feet or the capacity to store 10 tons of roasted coffee beans (at a density of 22-26 pounds per cubic foot).

The roasted bean blending system that will be used by the two coffee lines consists of discharging a predetermined quantity of beans from one or more of the four roasted bean storage bins. The beans are discharged from the storage bins into the grinder. As such, the blender is not a piece of equipment and therefore, has no processing rate or capacity.

The roasted coffee bean grinder that will supply ground beans for the two extractors has a grinding capacity of 1800 pounds of beans per hour. This capacity is more than adequate to supply 450 pounds per hour of ground beans to each of the extractors.

Mr. Clair Fancy
Division of Air Resources
Management

May 25, 1989
Page 2

The spent grounds cyclone is also used by both coffee lines. At the end of the one hour extraction cycle of each of the two extractors, the spent coffee grounds are expelled through the cyclone. This process requires less than one minute at the end of each one hour extraction cycle. Thus, the spent grounds cyclone is used less than two minutes out of any one hour. This cyclone is rated for a flow rate of 2750 actual cubic feet per minute at 220⁰F and 99 percent moisture.

The four system components described in the above paragraphs are the only equipment that will be mutual to both coffee lines.

2. Referring to No. 1, has any of this equipment been altered/modified since the original design and installation? If so, please explain.

None of the process equipment described in the previous paragraph has been altered or modified since it was originally installed.

If there are any further questions regarding this system, please do not hesitate to contact me.

Very truly yours,

KOGLER & ASSOCIATES


John B. Koogler, Ph.D, P.E.

JBK:wa

cc: Mr. Bruce Mitchell, FDER, Tallahassee ✓
BT/CHF 5-25-89 (FAX) BRN

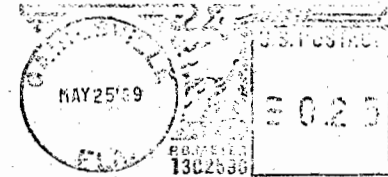




KOGLER & ASSOCIATES

ENVIRONMENTAL SERVICES

4014 NW THIRTEENTH STREET
GAINESVILLE, FLORIDA 32609

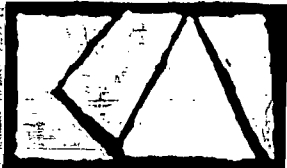


Mr. C. H. Fancy
Florida Department of Environmental
Regulation
Division of Air Resources Management
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

05/25/89 10:13

904 377 7158 KOOGLER & ASSOC.

01



KOOGLER & ASSOCIATES
ENVIRONMENTAL SERVICES

4014 NW THIRTEENTH STREET
GAINESVILLE, FLORIDA 32609
904/377-5822 • FAX 377-7158

RECEIVED

MAY 25 1989

DER - BAQM

FAX TRANSMITTAL FORM

TO:

James Mitchell
F O E C
Rm. 310.D

FROM:

John Koogler

SENT BY:

Wendy

DATE:

5/25/89

FAX PHONE:

904-377-7158

The text being transmitted consists of 2 pages
PLUS this one.

5-25-89

REMARKS:

*From Wendy (secretary);
@ 11:24
called Dr. Koogler's office to let him know
that we had received the letter.*

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

DISTRICT ROUTING SLIP

SECTION AGENCY

TO: Mr. Harry Kerns DATE: 3-31-84

C.C.
TO:

	PENSACOLA	NORTHWEST DISTRICT	
	PANAMA CITY	Northwest District Branch Office	
	TALLAHASSEE	Northwest District Branch Office	
X	TAMPA	SOUTHWEST DISTRICT	
	ORLANDO	ST. JOHNS RIVER DISTRICT	
	JACKSONVILLE	NORTHEAST DISTRICT	
	GAINESVILLE	Northeast District Branch Office	
	FORT MYERS	SOUTH FLORIDA DISTRICT	
	PUNTA GORDA	South Florida District Branch Office	
	MARATHON	South Florida District Branch Office	
	WEST PALM BEACH	SOUTHEAST FLORIDA DISTRICT	
	PORT ST. LUCIE	Southeast Florida Subdistrict	
Reply Optional <input type="checkbox"/>		Reply Required <input type="checkbox"/>	Info. Only <input type="checkbox"/>
Date Due: _____		Date Due: _____	

Whitcock to Roger Pfaff by
an accumulation of de minimis
increases.

ainment new source review
index S, 40 CFR 51.18 (j),
of de minimis increases at
the source to review. This
E. Reich to Charles Whitmore,
EPA's June 2, 1983 summary

COMMENTS:

Re: Lykes Pasco, Inc.

ts allows a series of de minimis
nt that the reviewing agency
gulations by splitting up what
modification into two or more
should be considered by the
ct if they are considered part
of the source owner or if the
are interdependent. For
enecking" project or a plant-
veral independent facilities,
le modification. If a company
also adds new steam-using
should also be considered part

FROM: R. Bruce Whitcomb TEL.: 56/278-1344

IN ORDER TO FACILITATE...
increases constitute a single project, EPA Region IV is adopting a policy
which allows an initial presumption based upon easily distinguishable
criteria, with allowance for rebuttal of the presumption by the applicant.
Region IV policy is to consider two or more increases as a single project
if the permit application for the last increase is submitted before the
first increase is operational. This is a reasonable dividing line because
it is easily discernible and because it would prohibit two facilities from
being considered separate projects if one could not operate without the
other.

To Bruce Mitchell
Date 3/31 Time 10:01

WHILE YOU WERE OUT

M Harry Kerns
of _____
Phone 552 7612
Area Code Number Extension

<input checked="" type="checkbox"/> TELEPHONED	<input checked="" type="checkbox"/> PLEASE CALL
<input type="checkbox"/> CALLED TO SEE YOU	<input type="checkbox"/> WILL CALL AGAIN
<input type="checkbox"/> WANTS TO SEE YOU	<input type="checkbox"/> URGENT
<input type="checkbox"/> RETURNED YOUR CALL	

Message by Kerns - Pasco T. A.
@ 10:40

Status - send memo of ECA

MS.
Operator

DEPARTMENT OF ENVIRONMENTAL REGULATION

ROUTING AND TRANSMITTAL SLIP

ACTION NO
ACTION DUE DATE

- | | |
|---------------------------------------|---------|
| 1. TO: (NAME, OFFICE, LOCATION) | Initial |
| Dr. John B. Koogler, P.E. | Date |
| 2. | Initial |
| Koogler + Associates, Env. Serv. Inc. | Date |
| 3. | Initial |
| 4014 N.W. 13 th St. | Date |
| 4. | Initial |
| Chairesville, FL 32609 | Date |

SECTION AGENCY

REMARKS:

Dear Dr. Koogler:

Enclosed is a copy of the U.S. EPA letter that I spoke of. If there are any questions, please give me a call.

Sincerely,

INFORMATION	
<input type="checkbox"/>	Review & Return
<input type="checkbox"/>	Review & File
<input type="checkbox"/>	Initial & Forward
<input type="checkbox"/>	
DISPOSITION	
<input type="checkbox"/>	Review & Respond
<input type="checkbox"/>	Prepare Response
<input type="checkbox"/>	For My Signature
<input type="checkbox"/>	For Your Signature
<input type="checkbox"/>	Let's Discuss
<input type="checkbox"/>	Set Up Meeting
<input type="checkbox"/>	Investigate & Report
<input type="checkbox"/>	Initial & Forward
<input type="checkbox"/>	Distribute
<input type="checkbox"/>	Concurrence
<input type="checkbox"/>	For Processing
<input type="checkbox"/>	Initial & Return

FROM: *R Bruce Mitchell*

DATE: 3-28-89
PHONE: (904) 488-1344

check to Roger Pfaff by accumulation of de minimis increases.

inherent new source review under 40 CFR 51.18 (j), de minimis increases at source to review. This was discussed by Reich to Charles Whitmore, EPA's June 2, 1983 summary

allows a series of de minimis increases that the reviewing agency could consider by splitting up what is considered a single project into two or more projects if they are considered part of the source owner or if the projects are interdependent. For a "check" project or a plant with independent facilities, modification. If a company also adds new steam-using equipment, it should also be considered part

increases constitute a single project, EPA region IV is adopting a policy which allows an initial presumption based upon easily distinguishable criteria, with allowance for rebuttal of the presumption by the applicant. Region IV policy is to consider two or more increases as a single project if the permit application for the last increase is submitted before the first increase is operational. This is a reasonable dividing line because it is easily discernible and because it would prohibit two facilities from being considered separate projects if one could not operate without the other.

To BRUCE
Date 3-27 Time 12:30

WHILE YOU WERE OUT
M JOHN KOOGLER
of _____
Phone 904-377-5822
Area Code Number Extension

<input type="checkbox"/>	TELEPHONED	<input checked="" type="checkbox"/>	PLEASE CALL
<input type="checkbox"/>	CALLED TO SEE YOU	<input type="checkbox"/>	WILL CALL AGAIN
<input type="checkbox"/>	WANTS TO SEE YOU	<input type="checkbox"/>	URGENT
<input type="checkbox"/>	RETURNED YOUR CALL		

Message RE: LYKES PASCO
PERMIT APPL.
3-28-89
@ 9:31-9:40
PAT
Operator

SENDER: Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.
 Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. Show to whom delivered, date, and addressee's address. (Extra charge) 2. Restricted Delivery (Extra charge)

3. Article Addressed to: Mr. Norvell W. Hunt Lykes Pasco, Inc. P. O. Box 97 Dade City, FL 33525	4. Article Number P 274 007 612 Type of Service: <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise
Always obtain signature of addressee or agent and <u>DATE DELIVERED</u> .	
5. Signature - Address X	8. Addressee's Address (ONLY if requested and fee paid)
6. Signature - Agent X <i>D. O. Hunt</i>	
7. Date of Delivery MAR 27 1989	

PS Form 3811, Mar. 1988 * U.S.G.P.O. 1988-212-865 DOMESTIC RETURN RECEIPT

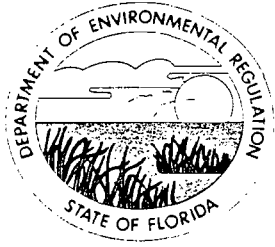
P 274 007 612

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
 NOT FOR INTERNATIONAL MAIL
 (See Reverse)

PS Form 3800, June 1985 * U.S.G.P.O. 1985-480-794

Sent to	Mr. Norvell W. Hunt, Lykes	
Street and No.	P. O. Box 97 Pasco	
P.O., State and ZIP Code	Dade City, FL 33525	
Postage		S
Certified Fee		
Special Delivery Fee		
Restricted Delivery Fee		
Return Receipt showing to whom and Date Delivered		
Return Receipt showing to whom, Date, and Address of Delivery		
TOTAL Postage and Fees		S
Postmark or Date	Mailed: 3-24-89 Permit: AC 51-156207	



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

March 24, 1989

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Norvell W. Hunt
Director of Technical Services
Lykes Pasco, Inc.
Post Office Box 97
Dade City, Florida 33525

Dear Mr. Hunt:

Re: Completeness Review for Application Package to
Construct No. AC 51-156207

The Department received Dr. John B. Koogler's letter dated February 20, 1989, regarding the above referenced construction permit package. Based on a review of the material, the application package is deemed incomplete. Therefore, please submit to the DER's Bureau of Air Quality Management the following information, including all calculations, assumptions and reference material, and the status will, again, be ascertained:

1. Please identify and provide the maximum design and installed processing rates/capacities or storage capacities for all the processing equipment (i.e., blender, grinder, storage bins, etc.) that are to be mutual to both the existing line No. 1 and the proposed new line No. 2.
2. Referring to No. 1, has any of this equipment been altered/modified since the original design and installation? If so, please explain.

If there are any questions, please call Bruce Mitchell at (904) 488-1344 or write to me at the above address.

Sincerely,

C. H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality
Management

CHF/BM/s

cc: B. Thomas, SW District
Dr. J. B. Koogler, P.E.
M. J. Mulholland, LPI
B. Hewitt, Esq., DER

3-23-89

Ask Kogler:

o ~~Size~~ / Process rate thru existing extractor (#1)

3-23-89
Harry Kerns
o 9:15-9:30

o

Roaster
15% wt loss @ 750 lbs/hr green beans
640 - yield
640 - cooler
640 - Ext

Extractor:

o Bean usage

1971 TPY 2200 TPY
450 lbs/hr vs 502.3 lbs/hr



8760 vs 6875 vs 7500

8760

can operate at
8760

Roaster/Cooler

640 lbs/hr = 2200 TPY from extractor

↓ raised to

6875 vs 7500 hrs/yr

max. 750 lbs/hr (capable)
2.5 batches/hr

calc. on emission rates

640 lbs/hr

↓ raised to

750 lbs/hr

$\frac{6875}{7500} = \frac{640}{x}$
= 698.2 lbs/hr

vs

o tin 2200

$7500 = 2200 \times 2000 / \text{ton} / x$

Roaster/cooler

$$\begin{aligned} 750 \times 7500 &= 5.625 \times 10^6 \text{ lbs} = \text{beans/yr} \\ & \quad 2.8125 \times 10^3 \text{ TPY} \\ 640 \times \text{''} &= 4.1 \times 10^6 \text{ ''} \\ & \quad 2.4 \times 10^5 \text{ TPY} \end{aligned}$$

processed green beans
product

Extractor @ 450 lbs/hr = 10,666.7 hrs/yr vs 8760

- 8760

x 450 = 429.0 TPY +

//

17%

last 5 yr
mod
New
etc.

Roaster :

$$2200 \times 2000 / 750 \\ = 5867 \text{ hrs/yr}$$

vs

$$7500 \text{ hrs/yr}$$

Roaster/cooler usage must be
separate

$$7500 / 640 \text{ vs } 640 \\ 15\% \text{ loss}$$

1. A051-152577 Rotary Citrus Peel Dyer #1
 (Nat. Gas / secondary fuel)
 max. 2.47% S

Est./0	ALL/1	T ₉₈
SO ₂ / 242 T ₉₄	PM / 139 T ₉₄	24/6/34
Act./0	ALL/1	
NO _x / 45.0	VE / % ?	

2. A051-152578 Cit. Peel Dyer #2
 (Nat. Gas / secondary fuel)
 max. 2.47% S

Est/0	ALL/1	T ₉₈
SO ₂ / 471.0 T ₉₄	PM / 69.0 T ₉₄	24/6/34
Act/0	ALL/1	
NO _x / 37.4 T ₉₄	VE / % (3)	

3. A051-129456 2500 HP Boiler #3 (17,110⁶ Btu/hr)
 (Natural Gas / #6 F.O. as stand-by)
 max. 2.5% S
 max. prod. of 100,000 lbs steam/hr

Pot./0	Pot./0	P
NMHC / 1.05 T ₉₄	SO ₂ / 0.45 T ₉₄	24/7/32
Pot/0	Pot/0	
PM / 3.24 T ₉₄	NO _x / 104.86 T ₉₄	
Pot/0	ALL/1	
CO / 26.21 T ₉₄	VE / 20% ± 40% @ 3 min.	

4. A051-129457 2000 HP Boiler #4 (max. 260 x 10⁶ Btu/hr)
 (Nat. Gas / #6 F.O. as stand-by)
 max. 2.5% S
 (3) max. prod. of 90,000 lbs steam/hr

Pot/0	Pot/0	P
NMHC / 1.10 T ₉₄	SO ₂ / 0.23 T ₉₄	24/7/32
Pot/0	Pot/0	
PM / 1.97 T ₉₄	NO _x / 57.16 T ₉₄	
Pot/0	ALL/0 (3)	
CO / 13.30 T ₉₄	VE / 20% ± 40% @ 3 min.	

5. A051-129458 6000 HP Boiler #5 (max. 2181 x 10⁶ Btu/hr)
 (Nat. Gas / #6 F.O. as stand-by)

Pot/0	Pot/0	T ₉₈
NMHC / 1.49 T ₉₄	SO ₂ / 0.64 T ₉₄	24/7/30
Pot/0	Pot/0	
PM / 5.32 T ₉₄	NO _x / 149.01 T ₉₄	
Pot/0	ALL/1	
CO / 37.25 T ₉₄	VE / % (3)	

6. A051- (3) Steam Tube Cit. Peel Dyer # D-3
 (3000 units (3) max. process rate)

ALL/1	ALL/1	T ₉₈
PM / 15.0 T ₉₄	VE / 20% (30 min)	24/6/34

7. A051- (3) steam Tube Cit. Peel Dyer # D-4
 (3000 units (3) max. process rate)

ALL/1	ALL/1	T ₉₈
PM / 15.0 T ₉₄	VE / 20% (30 min)	24/6/34

8. A051- (3) steam Tube Cit. Peel Dyer # D-5
 (3000 units (3) max. process rate)

ALL/1	ALL/1	T ₉₈
PM / 15.0 T ₉₄	VE / 20% (30 min)	24/6/34

9. A051-152582 steam Tube Cit. Peel Dyer # D-6
 (3000 units (3) max. process rate)

ALL/1	ALL/1	T ₉₈
PM / 15.0 T ₉₄	VE / 20% (30 min)	24/6/34

10. A051-152583 steam Tube Cit. Peel Dyer # D-7
 (3000 units (3) max. process rate)

ALL/1	ALL/1	T ₉₈
PM / 15.0 T ₉₄	VE / 20% (30 min)	24/6/34

11. A051- steam Tube Cit. Peel Dyer # D-8
 (3000/2500 units (3) max. process/production rate)

ALL/1	ALL/1	T ₉₈
PM / 15.0 T ₉₄ (3)	VE / 20% (30 min)	24/6/34

BEST AVAILABLE COPY

		Alt/1	Alt/1	Typ
12. A051-152585	steam Tube Cit. Peel Dyer # D-9 (3000 units ^②) max. process rate	PM/15.0 TTY	VE/20% (30 min)	24/6/34
13. A051- ^②	steam Tube Cit. Peel Dyer # D-10 (3000 units ^②) max. process rate	PM/15.0 TTY	VE/20% (50 min)	24/6/34
14. A051- ^②	steam Tube Cit. Peel Dyer # D-11 (3000 units ^②) max. process rate	PM/15.0 TTY	VE/20% (30 min)	24/6/34
15. A051-152588	steam Tube Cit. Peel Dyer # D-12 (3000 units ^②) max. process rate	PM/15.0 TTY	VE/20% (30 min)	24/6/34
16. A051-152589	steam Tube Cit. Peel Dyer # D-13 (3000 units ^②) max. process rate	PM/15.0 TTY	VE/20% (30 min)	24/6/34
17. A051- ^②	steam Tube Cit. Peel Dyer # D-14 (3000 units ^②) max. process rate	PM/15.0 TTY	VE/20% (30 min)	24/6/34
18. A051- ^②	steam Tube Cit. Peel Dyer # D-15 (3000 units ^②) max. process rate	PM/15.0 TTY	VE/20% (30 min)	24/6/34
* 19. A051- ^②	steam Tube Cit. Peel Dyer # D-16 (3000 units) Ton P ^② max. process rate	PM/15.0 TTY	VE/20% (30 min)	24/6/34
20. A051- ^②	steam Tube Cit. Peel Dyer # D-17 (3000 units ^②) max. process rate	PM/15.0 TTY	VE/ ^② ^②	24/6/34
21. A051-152594	steam Tube Cit. Peel Dyer # D-18 (3000 units ^②) max. process rate	PM/15.0 TTY	VE/ ^② ^②	24/6/34
22. A051-149866	300 lb. Batch Coffee Roaster Fined on M.C. & a cyclone (700 x 100) at max. heat input; 750/640 lbs/hr green beans - max. process/production rates) [2.5 batches/hr]	PM/8.54 TTY	VE/20% (60 min)	24/7/5
23. A051-115788	No. 1 Pellet Mill Cooler Cyclone (24,000 units ^②) max. process rate	PM/16.75 lbs/hr TPY ^②	VE/20% (30 min)	24/7/24
24. A051-115789	No. 2 Pellet Mill Cooler Cyclone (24,000 units ^②) max. process rate	PM/16.76 lbs/hr TPY ^②	VE/20% (30 min)	24/7/24
25. A051-115790	No. 3 Pellet Mill Cooler Cyclone (24,000 units ^②) max. process rate	PM/16.76 lbs/hr TPY ^②	VE/20% (30 min)	24/7/24

26. A051-115791

No. 4 Pellet Mill Cooler Cyclone
(24,000 units) max. process rate

All/1
PM/16.76 lbs/hr
TSP

All/1
VE/ (30 min)

Type

24/7/24

27. AC 51-136667

Spray Paint Booth for Car Vehicles

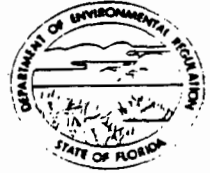
(?)

(?)

pollutants

Per/Type
(?)

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION



Interoffice Memorandum

FOR ROUTING TO OTHER THAN THE ADDRESSEE

To: _____	Locn: _____
To: _____	Locn: _____
To: _____	Locn: _____
From: _____	Date: _____

DATE: February 28, 1989

TO: C. H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality Management

THRU: Harry Kerns, P.E. *HK*
District Air Engineer
Southwest District

FROM: Cindy L. Phillips *CP*
Air Permitting Engineer

SUBJECT: Lykes Pasco, Inc.
AC51-156207 Coffee Roaster/Cooler and Extractor

RECEIVED

MAR 6 1989

DER-BAQM

Based on a review of the submitted information for the Lykes construction permit application, this office considers the application complete and requires no additional information. As your office has separated the extraction process from the roaster/cooler process and charged an additional source application fee, please assign a separate construction permit number for the extractor if you have not already done so.

PM
2-21-89
Gainesville, FL

file copy



KOOGLER & ASSOCIATES
ENVIRONMENTAL SERVICES
4014 NW THIRTEENTH STREET
GAINESVILLE, FLORIDA 32609
904/377-5822 • FAX 377-7158

KA 207-88-02

February 20, 1989

RECEIVED

FEB 22 1989

DER-BAQM

Mr. C.H. Fancy
Division of Air Resources
Management
Florida Department of
Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Subject: Lykes Pasco, Inc.
Supplemental Information to Support
Construction Permit Application for
Coffee Roaster
Permit AC51-156207

Dear Mr. Fancy:

The following information is supplied in response to your letter of December 22, 1988, requesting additional information to complete the subject air construction permit application. Responses are numbered to correspond with the numbered requests for information in your letter.

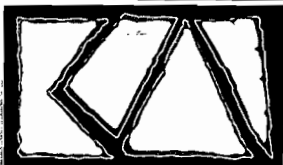
A1. Hours of Operating - Roaster and Cooler

The maximum operating time of the roaster and cooler will be 7,500 hours per year. An operating log will be maintained showing the cumulative hours of operation to assure that the 7,500 hour per year limit is not exceeded.

B1. Process Input and Product Weight Rate - Proposed Extractor

The roasted bean input rate to the extractor (450 pounds per hour) is correctly represented in Sections IIIA and B of the application that has been submitted to the Department. Likewise, the product weight rate from the extractor is also correctly represented in Section IIIB of the application. Nothing stated in Paragraph 5 of my letter to the Department dated November 22, 1988, effects or changes the roasted bean input weight rate or the product weight rate from the extractor.

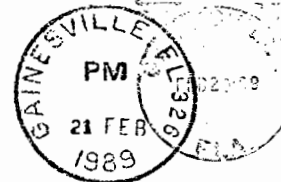
As described in the permit application, the roasted bean input weight to the extractor (one 450 pound batch each hour) is based upon a design limitation of the extractor and not upon the roasting, destoning and/or cooling rate of the preceding sections of the coffee line. The entire project is explicitly described in Section IIA of the permit application and detail calculations in Section V of the



KOOGLER & ASSOCIATES

ENVIRONMENTAL SERVICES

4014 NW THIRTEENTH STREET
GAINESVILLE, FLORIDA 32609



Mr. C.H. Fancy
Division of Air Resources Management
Florida Department of
Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400



application document the process input and product weight rates to each section of the line.

B2. Hours of Operation/Product Input - Existing Extractor

The construction permit for the existing extractor (AC51-62408) is silent regarding the hours of operation of the extractor. The permit application for the extractor shows annual air pollutant emission rates based on an operating time of 8,760 hours per year; or 100 percent of the time. As the construction permit for the operation does not limit the hours of operation and as the permit application explicitly states that the extractor will operate a maximum of 8,760 hours per year, it is implicit in the permits issued for the existing extractor (both constructing and operating permits) that the extractor can operate 8,760 hours per year.

As the existing extractor is permitted to operate 8,760 hours per year and as the roasted bean input to the extractor is limited by design to one 450 pound batch per hour, the roasted beans that may be supplied by the proposed roaster/cooler and those beans addressed in Paragraph 5 of my letter to the Department dated November 22, 1988, cannot increase the throughput rate of the extractor. Hence, these beans cannot increase actual air pollutant emissions from the extractor.

The roasted beans that may be supplied to the existing extractor by the proposed roaster/cooler will be supplied only in the event that the existing roaster/cooler does not operate at capacity. In this case, actual emissions from the existing roaster/cooler will decrease.

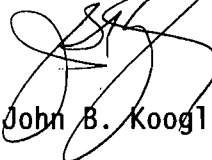
3. Design Input Rate - Proposed and Existing Extractor

The roasted bean input rates to both the proposed and the existing extractor are one 450 pound batch each hour.

If there any further questions regarding this permit application, please do not hesitate to contact me.

Very truly yours,

KOOGLER & ASSOCIATES



John B. Koogler, Ph.D, P.E.

JBK:wa

cc: Mr. M. Mulholland, Lykes Pasco
Mr. B. Mitchell, FDER-Tallahassee
Mr. B. Thomas, FDER-Tampa

CHF/BT



SENDER: Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.
 Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. Show to whom delivered, date, and addressee's address. (Extra charge)
 2. Restricted Delivery (Extra charge)

3. Article Addressed to: Mr. Norvell W. Hunt Director of Technical Services Lykes Pasco, Inc. P.O. Box 97 Dade City, FL 33525	4. Article Number P 274 007 542 Type of Service: <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise
5. Signature - Address X	8. Addressee's Address (ONLY if requested and fee paid)
6. Signature - Agent X <i>[Signature]</i>	
7. Date of Delivery <i>12/27/88</i>	

PS Form 3811, Mar. 1988 * U.S.G.P.O. 1988-212-865 DOMESTIC RETURN RECEIPT

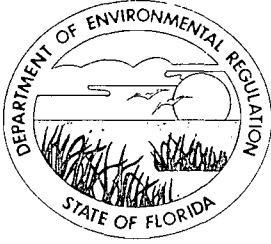
P 274 007 542

RECEIPT FOR CERTIFIED MAIL
 NO INSURANCE COVERAGE PROVIDED
 NOT FOR INTERNATIONAL MAIL
 (See Reverse)

* U.S.G.P.O. 1985-480-794

Sent to Mr. Norvell W. Hunt, Lykes Pasco, Inc.	
Street and No. P.O. Box 97	
P.O., State and ZIP Code Dade City, FL 33525	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date Mailed: 12-22-88 Permit: AC 51-156207	

PS Form 3800, June 1985



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

December 22, 1988

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Norvell W. Hunt
Director of Technical Services
Lykes Pasco, Inc.
Post Office Box 97
Dade City, Florida 33525

Dear Mr. Hunt:

Re: Completeness Review of Supplementary Information for the
Application Package to Construct: No. AC 51-156207

The Department received Dr. John B. Koogler's letter with enclosure dated November 22, 1988, on November 23, 1988. Based on a review of the supplementary information, the application package is deemed incomplete. Therefore, please submit the following information, including all assumptions, calculations and reference material, to the DER's Bureau of Air Quality Management and the status will, again, be ascertained.

A. Roaster and Cooler

1. Since the operations of the referenced sources are requested to be 24 hours per day, 7 days per week, and 52 weeks per year (8760 hours/year), while restricted to a maximum allowable of 7500 hours per year, please provide the means/methodology that will be utilized by the operators and company to accurately track and account for actual hours of operation of each source.

B. Extractor

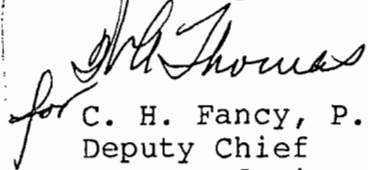
1. Based on the response in No. 5 of the November 22 letter, the process rates in section III.A. and B. of the application need to be revised to reflect the increase in bean usage (raw materials used and total process input rate) since the product weight is different from the input rates. Therefore, please revise the appropriate areas of the application and resubmit. Also, revise and submit any other sections of the application package and supplementary material that require revision pursuant to this issue.

Mr. Norvell W. Hunt
Page Two
December 22, 1988

2. Based on the response in No. 5 of the November 22 letter, any additional bean usage by the existing extractor provided by the new installation will be assumed to cause an actual emissions increase in pollutants from the existing extractor operation and constitute a modification. Therefore, if this is desired, please submit an application for a modification to the existing extractor along with the appropriate processing fee to the DER's Bureau of Air Quality Management.
3. What is the maximum hourly designed process input rate of beans into the existing extractor and the proposed new extractor?

If there are any questions, please call Bruce Mitchell at (904)488-1344 or write to me at the above address.

Sincerely,



for C. H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality
Management

CHF/BM/s

cc: B. Thomas, SW District
J. Koogler, P.E.
M. J. Mulholland, LPI
B. Hewitt, Esq., DER



RECEIVED
DER - MAIL ROOM

1988 DEC -8 AM 10:49

Lykes Pasco, Inc.
Post Office Box 97
Dade City, FL 34297-0097
Telephone: (904) 567-5211

December 5, 1988

Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, FL 32301-8341

1031

Attention: Patty Adams

RE: AIR CONSTRUCTION PERMIT APPLICATION
COFFEE ROASTER - AC51-156207

Dear Ms. Adams:

Enclosed you will find a check in the amount of \$200.00 to cover fee due for additional source on subject application.

Should you have any questions regarding this matter, please call Mike Mulholland at (904) 521-2278.

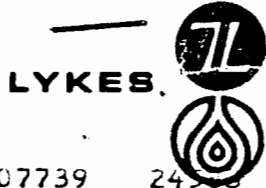
Sincerely,

LYKES PASCO, INC.

Lillian Mays
Office Administrator

LM/pc
Encl.

cc: M. J. Mulholland



PASCO, INC.

DADE CITY, FLORIDA • 33525

00168

First Florida Bank, N.A.
P.O. BOX 711
FORT MYERS, FLORIDA 33902-0711

63-329
670

107739 24500 \$200 DOLLARS AND 00 CENTS 107739 12/02/86 \$200.00

PAY
TO THE
ORDER OF

DEPT OF ENVIRONMENTAL
REGULATION
2600 BLAIR STONE RD.
TALLAHASSEE, FL 32301

BY [Signature] BY [Signature]

Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, FL 32301-8341

1031

Attention: Patty Adams

RE: AIR CONSTRUCTION PERMIT APPLICATION
COFFEE ROASTER - AC51-156207

Dear Ms. Adams:

Enclosed you will find a check in the amount of \$200.00
to cover fee due for additional source on subject
application.

Should you have any questions regarding this matter,
please call Mike Mulholland at (904) 521-2278.

Sincerely,

LYKES PASCO, INC.

[Signature]
Lillian Mays
Office Administrator

LM/pc
Encl.

cc: M. J. Mulholland

REMITTANCE ADVICE
PLEASE DETACH BEFORE DEPOSITING

DATE OF INVOICE	DESCRIPTION	INVOICE AMOUNT	DISCOUNT	CHECK AMOUNT
11/28/88	FEE DUE 88	200.00	.00	200.00
		200.00	.00	200.00

LYKES PASCO, INC.
DADE CITY, FLORIDA 33525



LYKES PASCO, INC.

904 567-5211



P.O. BOX 97 • DADE CITY, FLORIDA • 33525

PURCHASE ORDER

TO: Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, FL. 32301-8341

No. LP 195463

DATE 11/29/88

SHIP AND INVOICE TO LYKES PASCO, INC.
U.S. HIGHWAY 301 NORTH
DADE CITY, FLORIDA 33525

DEL. DATE ASAP

REQ. NO: 1499/X0059

VIA: BW

TERMS: Cash F.O.B. SP

PURCHASE ORDER NUMBER MUST BE SHOWN ON ALL LISTS, SHIPMENTS, INVOICES, CORRESPONDENCE, ETC.

MAIL YOUR INVOICE PROMPTLY ON DATE OF SHIPMENT.

PLEASE FURNISH US WITH THE MATERIAL SPECIFIED BELOW ON THE TERMS HEREIN SET FORTH AND SUBJECT TO CONDITIONS AS SHOWN.

Table with 5 columns: ITEM NO., QUAN., UNIT, UNIT PRICE, AMOUNT. Row 1: 88202-X0059-1642 Kaufmann, Fee due for additional source on Air Construction Permit Application Previously Submitted, 200 00. Includes a date stamp: 1988 NOV 30 PM 3:22.

THIS ORDER IS NOT BINDING UNTIL ACCEPTED BY SELLER. ACCEPTANCE OF THIS ORDER IN WRITING BY SELLER OR BY SHIPMENT OF MATERIALS HEREUNDER TO BUYER WHICH ARE ACCEPTED BY BUYER, SHALL CONSTITUTE ACCEPTANCE BY SELLER OF THE TERMS AND CONDITIONS ON THE FACE AND REVERSE SIDE HEREOF.

PURCHASE ORDER RENDERED IN DUPLICATE, SELLER RETAINS ORIGINAL NUMBER 1, DUPLICATE COPY NUMBER 2, MUST BE SIGNED AND RETURNED AT ONCE TO THE UNDERSIGNED.

LYKES PASCO, INC.

BY

Handwritten signature of R. Bruce Garland

R. BRUCE GARLAND
PURCHASING MANAGER

TERMS AND CONDITIONS

No allowance will be made for packing, cartage or crating charges unless stated herein.

This order expressly limits acceptance to the terms stated herein and any additional or different terms proposed by the Seller are rejected unless expressly assented to in writing by Buyer. No contract shall exist except as herein provided.

Our count will be accepted as final and conclusive on all shipments not accompanied by packing ticket.

All material received by us will be subject to inspection and rejection, and rejected material may be returned at your expense, including transportation charges paid by us; provided, however, that no material which complies with your standard inspection sheets shall be rejected by us. You will furnish such standard inspection sheets on our request. You guarantee that, if within a period of six months from the date of shipment any parts are found defective, new parts will be shipped free of charge, provided the machine has been given normal and proper usage.

You expressly warrant that all articles, material and work covered by this order will conform to the specifications, drawings, samples or other description furnished by us, and will be fit and sufficient for the purpose intended, merchantable, of good material and workmanship, and free from defect. Acceptance of articles, material, equipment and work by us shall not release you from liability for defects therein.

Any material furnished by us on other than a charge basis in connection with this order will be deemed as held by you upon consignment; and you agree to pay for all such material spoiled by you or not otherwise satisfactorily accounted for.

Buyer may cancel this order by written notice to Seller. Upon such cancellation, Seller's only claim for damages or otherwise shall be to receive from Buyer payment for all accepted materials, if any, which have heretofore been delivered to Buyer but not paid for and all materials, if any, manufactured in accordance with the terms of this order but not yet delivered to Buyer and for the cost of all materials in process of manufacture under the terms of this order and all commitments made in good faith by Seller for raw materials required in such manufacture, less the recoverable value of such work in process of such materials. Upon cancellation, Seller shall promptly make available to Buyer, at its request, all books and documents for determination of such costs.

You guarantee that the articles described herein, and the sale or use of them will not infringe any U.S. patent, and you covenant that you will, at your own expense, defend every suit which will be brought against us, or those selling or using our product (provided you are promptly notified of such suit and all papers therein are delivered to you) for any alleged infringement of any patent by reason of the sale or use of such articles, and you agree that you will pay all costs, damages, and profits recoverable in any such suit.

Any waiver of strict compliance with the terms of this order shall not be a waiver of our right to insist upon strict compliance with the terms of this order thereafter.

If it becomes necessary for the Seller, either as principal or by agent or employee, to enter upon the premises or property of the purchaser, in order to construct, erect, inspect or deliver hereunder, the Seller hereby covenants and agrees to take, use, provide and make all proper, necessary and sufficient precaution, safeguards and protections against the occurrence or happening of any accidents, injuries or damages to any person or property during the progress of the work herein covered, and to be responsible for, and to indemnify and save harmless the purchaser from all loss or damage to persons or property and all claims by reason of all, or any, such accidents, injuries or damages that may happen or occur by reason of or in connection with such work except such as may be caused by the sole negligence of the Purchaser, and from all fines, penalties and loss incurred for or by reason of the violation of any city or borough ordinance or regulation, or any law, and further agrees to defend at the Seller's expense, any and all suits or actions, civil or criminal arising out of such claims or matters; and further agrees to procure and carry the insurance of employees on such work that may be required by any Workmen's Compensation Act or similar liability act.

The Seller warrants, that no law, rule or ordinance of the United States, a state or any other governmental authority or agency has been violated in the manufacture or sale of the items covered by this order.

Shipment must be made on the dates specified. We reserve the right to cancel or postpone deliveries of any material listed above which is not shipped to our plant at the time specified therefor.

Statement of account will be sent to our accounting department monthly or semimonthly for verification prior to payment, statement should list all items paid or unpaid, dating from the last statement rendered. Delay in receiving statement of invoices, also errors and omissions on statement, will be considered just cause for withholding settlement without losing cash discount privilege.

This agreement/purchase order/contract shall be construed and enforced in accordance with, and its terms and provisions and the rights and obligation of the parties are to be governed by, the law of the State of Florida.

Payments made by check only. NO DRAFTS WILL BE HONORED.

EQUAL EMPLOYMENT OPPORTUNITY CLAUSE

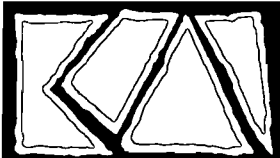
There is incorporated in this contract, and made a part hereof as if set forth at length herein, the provisions representing contractors' agreements with respect to non-discriminatory employment practices quoted in Sec. 202 of Executive Order 11246 of September 24, 1965 and the Rules and Regulations promulgated pursuant thereto including the order on Elimination of Segregated Facilities promulgated by the Secretary of Labor quoted in Sec. 32 of Federal Regulation 7439 of May 19, 1967. The Seller represents and warrants to the Buyer that the Seller has read said Executive Order and Federal Regulations and is fully informed of the Seller's responsibilities thereunder. The Seller represents that he does not maintain "segregated facilities" as defined in the Regulations. The Seller agrees that it will file Compliance Reports with such agencies, departments or offices, within such times, containing such information as to its practices, policies, programs and employment statistics, and in such form as the Secretary of Labor may prescribe. The Seller further agrees that it will from time to time, if and when Buyer requests, promptly furnish the Buyer with a certificate signed by the Seller to evidence its filing of required Compliance Reports or, at the election of the Buyer, signed copies of such Compliance Reports. The Seller/Contractor further agrees to execute and implement the Buyer's "Supplement to Contract and Purchase Order/Contractor's Certification" (herein incorporated by reference) and agrees that the provisions of that document are made a part of each contract and each Purchase Order which now exists or which may be entered into hereafter between the Seller/Contractor and Lykes Pasco, Inc.

OSHA STATEMENT

Your quotation is to include a statement of warranty that the equipment meets or exceeds standards of the Occupational Safety and Health Act of 1970. If unable to do so, list exceptions. If additional costs apply to meet required user OSHA standards, list such costs as a separate item.

TOXIC SUBSTANCES

There is incorporated in this contract and made a part hereof as if set forth at length herein, the provisions of the Florida Right to Know Law, Chapter 442, Sections 101-127, Florida Statutes, relating to a manufacturer, importer, or distributor (hereinafter called "seller") who is responsible for preparing and transmitting a "Material Safety Data Sheet," and/or any labeling requirement specified by the Act. The Seller warrants and represents to the Buyer that any substances that may be toxic are labeled pursuant to applicable federal and state law. The Seller represents and warrants that it is in compliance with Chapter 442, Florida Statutes, and with the OSHA Hazard Communication Standard, and further has prepared and will provide Buyer with a Material Safety Data Sheet (MSDS) for each and every toxic substance listed under this contract and that such MSDS is current, accurate, and complete. Seller further warrants that it will revise and communicate to Buyer on a timely basis any new information which would affect the contents of the existing MSDS.



KOUGLER & ASSOCIATES
ENVIRONMENTAL SERVICES

4014 NW THIRTEENTH STREET
GAINESVILLE, FLORIDA 32609
904/377-5822 ■ FAX 377-7158

PM
11-22-88
Gainesville, FL

file copy

KA 207-88-02

November 22, 1988

RECEIVED

NOV 23 1988

DER-BAQM

Mr. C. H. Fancy
Division of Air Resources Management
Florida Department of
Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Subject: Lykes Pasco Inc.
Supplemental Information to Support Construction
Permit Application for Coffee Roaster
Permit AC51-156207

Dear Mr. Fancy:

The following information is supplied in response to your letter of November 16, 1988, requesting additional information to support the subject construction permit application. The responses are numbered to correspond with the numbered requests for information in your letter.

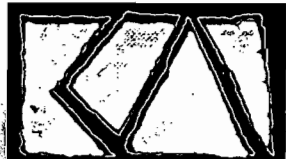
1. PERMIT FEE

By copy of this letter, I am requesting that Lykes Pasco forward an additional permit fee of \$200.00 payable to the Florida Department of Environmental Regulation to your office.

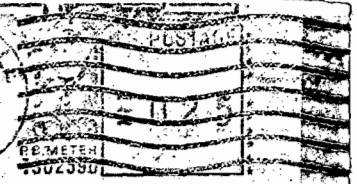
2. HOURS OF OPERATION

The roaster and cooler will operate a maximum of 7,500 hours per year and the extractor will operate a maximum of 8,760 hours per year. The permit condition limiting the operating time for the roaster and cooler should state that each will operate 24-hours a day, seven days per week and 52 weeks per year; but not to exceed 7,500 hours per year. The condition limiting the hours of operation of the extractor should state that the extractor can operate 24-hours a day, seven days a week and 52 weeks per year for a total of 8,760 hours per year.

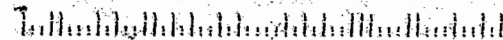
The annual emission rates requested in the permit application are based upon the hours of operation stated in the preceding paragraph.



KOGLER & ASSOCIATES
ENVIRONMENTAL SERVICES
4014 NW THIRTEENTH STREET
GAINESVILLE, FLORIDA 32609



Mr. C. H. Fancy
Division of Air Resources Management
Florida Department of
Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400



3. CYCLONE CONTROL EFFICIENCY

The control efficiency of 66 percent for the chaff cyclone is based upon my professional opinion taking into consideration the density of the chaff and the diameter of the cyclone.

4. PARTICULATE MATTER EMISSIONS FROM BEAN COOLER

The controlled emission rate of particulate matter from the bean cooler is estimated to be 0.2 pounds per hour. This emission rate is calculated on page 7c of 12 of the permit application. The control efficiency of 66 percent estimated for the bean cooler cyclone is based upon my professional opinion taking into consideration the nature of the material being controlled and the diameter of the cyclone.

5. BEAN LOSS IN DESTONER AND GRINDER

An annual bean usage of 1,971 tons per year in the extractor is based upon the amount of roasted, ground coffee beans supplied to the extractor. If there is a ten percent bean loss in the destoner and grinder, this means that 2,200 tons per year of roasted beans will have to be introduced to the destoner and grinder to produce 1,971 tons of roasted, ground beans for the extractor. To produce the 2,200 tons per year of roasted beans, the roaster and cooler will have to operate 6,875 hours per year. It was assumed that the roaster and cooler would operate a maximum of 7,500 hours per year however; with the additional 625 hours per year (7,500 minus 6,875) being used to supply roasted beans to the existing extractor should it be necessary.

No revisions are necessary for either the operating hours or annual thru-put rates.

6. ROASTER/COOLER THRU-PUT RATE

See response to Item #5.

7. ROASTER/COOLER OPERATING HOURS

See response to Item #5.

8. REVISED CALCULATIONS

Based upon the responses provided for Items 2-7, no revisions are necessary in the permit application received in your office.

9. COFFEE ROASTING EMISSION FACTORS

The emission factors published in EPA Publication AP-42, Section 6-2 entitled, "Coffee Roasting" are based upon the weight of green beans roasted. The input rate of green coffee beans to the proposed system is 750 pounds per hour; the input rate used for calculating emission rates.

10. EMISSION INCREASES FROM OTHER SOURCES

The permitting activities that have taken place at Lykes Pasco in the past five years are summarized in the attached table. There have been no changes in methods of operation, new construction or other activities that would cause increases in air pollutant emission rates other than those identified by the attached permitting summary. Based upon this summary, and taking into consideration the expected emissions from the proposed coffee roasting line, there will be no significant emission increases at the Lykes Pasco Dade City facility.

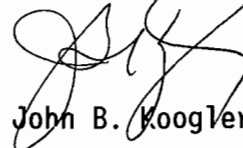
11. EFFECT OF PROPOSED COFFEE ROASTER ON OTHER PROCESSING EQUIPMENT

The proposed coffee roasting system will not effect air pollutant emissions from any other processing equipment at the Lykes Pasco facility.

If there are any further questions regarding the subject permit application, please do not hesitate to contact me.

Very truly yours,

KOOGLER & ASSOCIATES



John B. Koogler, Ph.D, P.E.

JBK:wa
Enc.

cc: Mr. Mike Mulholland, Lykes Pasco
Mr. Bruce Mitchell, FDER, Tallahassee
Mr. Bill Thomas, FDER, Tampa
CAF/BT



SUMMARY OF PERMITTING ACTIVITIES
1983 - 1988

Lykes Pasco, Inc.
Dade City, Florida

Source/Permit	Date	Annual Emissions (tpy)			
		Part. Matter	SO ₂	NO _x	VOC
No. 1 Coffee Roaster	4/21/83	NA; permitted beyond five years ago			
Pellet Coolers	4/21/83	NA; operating permits issued for four pellet coolers constructed between 1970 and 1978 - No increase in emissions.			
Spray Paint Booth AC51-136667	9/23/87	0.2	-	-	6.2
Boilers	10/07/87	NA; modified three boiler operating permits to allow the use of used-oil fuel - No increase in emissions			
No. 2 Coffee Roster AC51-155207	Present	10.7	-	0.2	1.6
TOTAL		10.9	-	0.2	7.8
Deminimis emission increases (17-2.500, FAC)		25	40	40	100



● **SENDER:** Complete items 1 and 2 when additional services are desired, and complete items 3 and 4. Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. Show to whom delivered, date, and addressee's address. (Extra charge) 2. Restricted Delivery (Extra charge)

3. Article Addressed to: Mr. Norvell W. Hunt Director of Technical Services Lykes Pasco, Inc. P. O. Box 97 Dade City, FL 33525	Article Number P 274 007 520 Type of Service: <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise Always obtain signature of addressee or agent and DATE DELIVERED.
5. Signature — Address X	8. Addressee's Address (ONLY if requested and fee paid)
6. Signature — Agent X <i>D. Orsby</i>	
7. Date of Delivery <i>11-21-88</i>	

PS Form 3811, Mar. 1988 * U.S.G.P.O. 1988-212-865 DOMESTIC RETURN RECEIPT

P 274 007 520

RECEIPT FOR CERTIFIED MAIL
 NO INSURANCE COVERAGE PROVIDED
 NOT FOR INTERNATIONAL MAIL
 (See Reverse)

* U.S.G.P.O. 1985-480-794

Sent to	
Mr. Norvell W. Hunt, Lykes Pasco, Inc.	
Street and No.	
P.O. Box 97	
P.O., State and ZIP Code	
Dade City, FL 33525	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date	
Mailed: 11-16-88	
Permit: AC 51-156207	

PS Form 3800, June 1985



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

November 16, 1988

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Norvell W. Hunt
Director of Technical Services
Lykes Pasco, Inc.
P. O. Box 97
Dade City, Florida 33525

Dear Mr. Hunt:

Re: Completeness Review for Application Package to Construct
No. AC 51-156207

The Department received the above referenced application package to construct a new coffee roaster, cooler, and extractor. Based on a review of the application package, it is deemed incomplete. Therefore, please submit to the DER's Bureau of Air Quality Management (BAQM) the following information, including all calculations, assumptions and reference material, and the status will, again, be ascertained:

1. Since there are two (2) air pollution sources (roaster/cooler and extractor) contained in one application package, the appropriate processing fee is \$200.00 per source for a total of \$400.00. Please remit the amount of \$200.00, since only \$200.00 has been received by the Department.
2. The application package contains hours of operation of 8760, 7500 and 6875. Since the hours of operation will become a condition for each source, please provide each operational schedule (hrs/day, days/wk and wks/yr) that you desire. Also, recalculate and submit the potential pollutant emissions for each source based on the operational schedule.
3. In Section II, on page "2b of 12", 1st paragraph, a particulate matter (PM) control efficiency of 66 percent and a PM emission rate of 1.0 lb/hr is estimated for the chaff cyclone. Please provide the basis for these estimates.

Mr. Norvell W. Hunt
Page Two
November 16, 1988

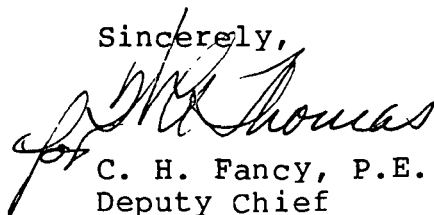
4. In Section II, on page "2b of 12", 2nd paragraph, the PM emission rate of 0.2 lb/hr is estimated for the bean cooler cyclone. Please provide the basis for this estimate.
5. In Section V, on page "7a of 12", Nos. 2/3., Controlled and Uncontrolled Emissions, Hours of Operation, for the Extractor, the annual bean usage of 1971 TPY is calculated using 8760 hrs/yr and the maximum bean usage of 450 lbs/hr. By assuming a 10% loss and using this to recalculate the annual bean usage does one of two things, it either means the extractor can process more beans (502 lbs/hr) than the proposed maximum hourly usage of 450 lbs/hr or there are more hours in the year than 8760. Since the latter is not possible, please explain and justify the loss calculation to increase the annual as well as the maximum hourly bean usage through the extractor. Please revise and submit the "Process Rate" in No. 1, Section V, if necessary.
6. In Section V, on page "7b of 12", Nos. 2/3., Controlled and Uncontrolled Emissions, Hours of Operation, for the Roaster/Cooler, the calculation for the operating time uses the annual bean usage through the extractor of 2200 TPY, which is questioned in No. 5. Unless the extractor's annual bean usage is justified, the operating time should be calculated using the 1971 TPY. Therefore, please recalculate and submit the operating time for the roaster/cooler, if necessary.
7. Referencing No. 6 above, if the extractor's bean usage is justified, then the increase in the operating time from the 6875 hrs/yr to "say 7500 hrs/yr" increases the maximum bean throughput/usage in the Roaster/Cooler from 640 lbs/hr to 698 lbs/hr and also increases the potential bean throughput/usage through the Extractor to 2400 TPY. Please explain and justify these increases in potential throughput/usage of beans for all sources. Also, provide the maximum process rates/usages of beans for each source, which will become a condition for each source in the permit.
8. Based on your answers to Nos. 2-7 above, please calculate the potential pollutant emissions for each source, which are currently reflected on pages "7b-7d of 12", Section V. Also, please revise No. 1, Section V, Process Rates, on page "7a of 12", where necessary, to reflect the maximum process rates of beans.

Mr. Norvell W. Hunt
Page Three
November 16, 1988

9. In Section V, on pages "7b-7c of 12", Nos. 2/3., Controlled and Uncontrolled Emissions, Emission Rates, the emissions are based on 750 lbs/hr bean usage, yet 15% is estimated to be water moisture. Therefore, the potential emissions from each source should be based on 637.5 lbs/hr, say 640 lbs/hr. Please recalculate and submit the potential pollutant emissions for each source. However and based on answers to previous questions, if the hourly bean usages through the various sources increases/decreases from the original proposal, please recalculate and submit the potential pollutant emissions based on the new bean usage/process rates.
10. In the last five years, what is the total net potential pollutant emission in tons per year that has occurred at the existing facility due to modifications and new construction? Also, please provide the associated construction permit number(s) and the source(s) affected.
11. Will the addition of the new processing equipment cause any actual pollutant emissions increase from any of the existing processing equipment/air pollution source(s)? If so, please identify the source(s), calculate the potential pollutant emission increases expected, and submit an application, along with the processing fee, to the DER's BAQM.

If there are any questions, please call Bruce Mitchell at (904) 488-1344 or write to me at the above address.

Sincerely,



C. H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality
Management

CHF/plm

cc: B. Thomas, SW Dist.
Dr. John B. Koogler, P.E.
M. J. Mulholland, LPI
B. Hewitt, Esq., DER



PM
10-17-88
Dade City, FL
RECEIVED
DER - MAIL ROOM
1988 OCT 19 AM 10:16

0091

Lykes Pasco, Inc.
Post Office Box 97
Dade City, FL 34297-0097
Telephone: (904) 567-5211

October 17, 1988

RECEIVED
OCT 19 1988
DER - BAQM

Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, FL 32301

Attention: Patty Adams

RE: AIR CONSTRUCTION PERMIT APPLICATION
COFFEE ROASTER

Dear Ms. Adams:

Per instructions from Koogler & Associates, enclosed you will find a check in the amount of \$100.00 to cover the additional fee due on subject application.

Should you have any questions regarding this matter, please call Mike Mulholland at (904) 521-2278.

Sincerely,

LYKES PASCO, INC.

Lillian Mays
Office Administrator

LM/pc
Encl.

cc: M. J. Mulholland

001031

LYKES



PASCO, INC.

DADE CITY, FLORIDA • 33525

0091

First Florida Bank, N.A.
P.O. BOX 711
FORT MYERS, FLORIDA 33902-0711

63-329
670

104168

24505

\$100 DOLLARS AND 00 CENTS 104168

CHECK
NUMBER

CHECK
DATE
10/13/88

CHECK
AMOUNT
\$100.00

PAY
TO THE
ORDER OF

DEPT OF ENVIRONMENTAL
REGULATION
2600 BLAIR STONE RD.
TALLAHASSEE, FL 32301

BY

BY

REMITTANCE ADVICE
PLEASE DETACH BEFORE DEPOSITING

DATE OF INVOICE	DESCRIPTION	INVOICE AMOUNT	DISCOUNT	CHECK AMOUNT
10/11/8	ADDITIONAL FEE DUE 88	100.00	.00	100.00
		100.00	0091 .00	100.00

LYKES PASCO, INC.
DADE CITY, FLORIDA 33525

Sincerely,

LYKES PASCO, INC.

Lillian Mays
Office Administrator

LM/pc
Encl.

cc: M. J. Mulholland

001031



RECEIVED
DER - MAIL ROOM
1988 OCT 10 AM 9:38

Lykes Pasco, Inc.
Post Office Box 97
Dade City, FL 34297-0097
Telephone: (904) 567-5211

RECEIVED

OCT 10 1988

DER - BAQM

October 6, 1988

Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, FL 32301-3241

ATTENTION: Mr. Ciar Fancy

RE: Application to Construct Coffee Grinder

Dear Mr. Fancy:

Enclosed are four (4) copies of the subject Application to Construct Air Pollution Source as well as a check in the amount of \$100.00.

Should you have any questions concerning this application, please give me a call.

Sincerely,

LYKES PASCO, INC.

M. J. Mulholland
Quality Assurance Project Manager

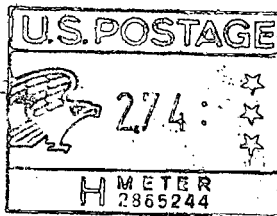
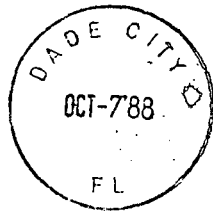
MJM:lm
Enclosures (5)

cc: N. W. Hunt - LPI
J. P. Olszowy - LPI
John B. Koogler - Koogler & Associates

RECEIVED

OCT 19 1988

DER - BAQM



M.J. Mulholland

Phone: (904) 567- 5211
P. O. BOX 97
DADE CITY, FL 33525

TO: Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, FL 32301-3241

Attention: Mr. Clia Fancy

CONTENTS:

POSTMASTER: This Parcel May be Opened for Postal Inspection
if necessary. **RETURN POSTAGE GUARANTEED.**

A-395 (H941163)

10080

First Florida Bank, N.A.
P.O. BOX 711
FORT MYERS, FLORIDA 33902-0711

63-329
670



PASCO, INC.

DADE CITY, FLORIDA • 33525

102942 19265

\$100 DOLLARS AND 00 CENTS 102942

CHECK
NUMBER

CHECK
DATE
9/28/88

CHECK
AMOUNT
\$100.00

PAY
TO THE
ORDER OF

DEPT OF ENVIR. REGULATION
~~SW DISTRICT OFFICE~~ 2600 Blair Stone Road
~~4520 OAK FAIR BLVD~~ Tallahassee, FL 32301-3241
~~TAMPA, FL 33610~~

BY

BY

~~DEPT OF ENVIR. REGULATION~~
2600 Blair Stone Road
Tallahassee, FL 32301-3241

ATTENTION: Mr. Ciar Fancy

RE: Application to Construct Coffee Grinder

Dear Mr. Fancy:

Enclosed are four (4) copies of the subject Application to Construct Air Pollution Source as well as a check in the amount of \$100.00.

Should you have any questions concerning this application, please give me a call.

Sincerely,

LYKES PASCO, INC.

M. J. Mulholland
Quality Assurance Project Manager

MJM:lm
Enclosures (5)

cc: N. W. Hunt - LPI
J. P. Olszowy - LPI
John B. Koogler - Koogler & Associates

1031

REMITTANCE ADVICE
PLEASE DETACH BEFORE DEPOSITING

DATE OF INVOICE	DESCRIPTION	INVOICE AMOUNT	DISCOUNT	CHECK AMOUNT
9/23/8	COFFEE ROASTER 88	100.00	.00	100.00
		100.00	.00	100.00

LYKES PASCO, INC.
DADE CITY, FLORIDA 33525

904 567-5211

LYKES PASCO, INC.



P.O. BOX 97 • DADE CITY, FLORIDA • 33525

PURCHASE ORDER

TO: Department of Environmental Regulations

No. LP187783

DATE 9/26/88

SHIP AND INVOICE TO
LYKES PASCO, INC.
U.S. HIGHWAY 301 NORTH
DADE CITY, FLORIDA 33525

DEL. DATE ASAP

REQ. NO. 1336/X0059

VIA: BW

TERMS: Check w/order

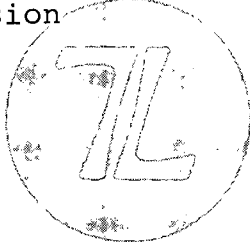
F.O.B.

SP

PURCHASE ORDER NUMBER MUST BE SHOWN ON ALL LISTS, SHIPMENTS, INVOICES, CORRESPONDENCE, ETC.

MAIL YOUR INVOICE PROMPTLY ON DATE OF SHIPMENT.

PLEASE FURNISH US WITH THE MATERIAL SPECIFIED BELOW ON THE TERMS HEREIN SET FORTH AND SUBJECT TO CONDITIONS AS SHOWN.

ITEM NO.	QUAN.	UNIT	88202-X0059-1642 M. Kaufman	UNIT PRICE	AMOUNT
1	1		Second permit for coffee roaster on coffee expansion 		100 00

THIS ORDER IS NOT BINDING UNTIL ACCEPTED BY SELLER. ACCEPTANCE OF THIS ORDER IN WRITING BY SELLER OR BY SHIPMENT OF MATERIALS HEREUNDER TO BUYER WHICH ARE ACCEPTED BY BUYER, SHALL CONSTITUTE ACCEPTANCE BY SELLER OF THE TERMS AND CONDITIONS ON THE FACE AND REVERSE SIDE HEREOF.

PURCHASE ORDER RENDERED IN DUPLICATE, SELLER RETAINS ORIGINAL NUMBER 1, DUPLICATE COPY NUMBER 2, MUST BE SIGNED AND RETURNED AT ONCE TO THE UNDERSIGNED.

LYKES PASCO, INC.

BY 

PURCHASING MANAGER
R. B. Garland

TERMS AND CONDITIONS

No allowance will be made for packing, cartage or crating charges unless stated herein.

This order expressly limits acceptance to the terms stated herein and any additional or different terms proposed by the Seller are rejected unless expressly assented to in writing by Buyer. No contract shall exist except as herein provided.

Our count will be accepted as final and conclusive on all shipments not accompanied by packing ticket.

All material received by us will be subject to inspection and rejection, and rejected material may be returned at your expense, including transportation charges paid by us; provided, however, that no material which complies with your standard inspection sheets shall be rejected by us. You will furnish such standard inspection sheets on our request. You guarantee that, if within a period of six months from the date of shipment any parts are found defective, new parts will be shipped free of charge, provided the machine has been given normal and proper usage.

You expressly warrant that all articles, material and work covered by this order will conform to the specifications, drawings, samples or other description furnished by us, and will be fit and sufficient for the purpose intended, merchantable, of good material and workmanship, and free from defect. Acceptance of articles, material, equipment and work by us shall not release you from liability for defects therein.

Any material furnished by us on other than a charge basis in connection with this order will be deemed as held by you upon consignment; and you agree to pay for all such material spoiled by you or not otherwise satisfactorily accounted for.

Buyer may cancel this order by written notice to Seller. Upon such cancellation, Seller's only claim for damages or otherwise shall be to receive from Buyer payment for all accepted materials, if any, which have heretofore been delivered to Buyer but not paid for and all materials, if any, manufactured in accordance with the terms of this order but not yet delivered to Buyer and for the cost of all materials in process of manufacture under the terms of this order and all commitments made in good faith by Seller for raw materials required in such manufacture, less the recoverable value of such work in process of such materials. Upon cancellation, Seller shall promptly make available to Buyer, at its request, all books and documents for determination of such costs.

You guarantee that the articles described herein, and the sale or use of them will not infringe any U.S. patent, and you covenant that you will, at your own expense, defend every suit which will be brought against us, or those selling or using our product (provided you are promptly notified of such suit and all papers therein are delivered to you) for any alleged infringement of any patent by reason of the sale or use of such articles, and you agree that you will pay all costs, damages, and profits recoverable in any such suit.

Any waiver of strict compliance with the terms of this order shall not be a waiver of our right to insist upon strict compliance with the terms of this order thereafter.

If it becomes necessary for the Seller, either as principal or by agent or employee, to enter upon the premises or property of the purchaser, in order to construct, erect, inspect or deliver hereunder, the Seller hereby covenants and agrees to take, use, provide and make all proper, necessary and sufficient precaution, safeguards and protections against the occurrence or happening of any accidents, injuries or damages to any person or property during the progress of the work herein covered, and to be responsible for, and to indemnify and save harmless the purchaser from all loss or damage to persons or property and all claims by reason of all, or any, such accidents, injuries or damages that may happen or occur by reason of or in connection with such work except such as may be caused by the sole negligence of the Purchaser, and from all fines, penalties and loss incurred for or by reason of the violation of any city or borough ordinance or regulation, or any law, and further agrees to defend at the Seller's expense, any and all suits or actions, civil or criminal arising out of such claims or matters; and further agrees to procure and carry the insurance of employees on such work that may be required by any Workmen's Compensation Act or similar liability act.

The Seller warrants, that no law, rule or ordinance of the United States, a state or any other governmental authority or agency has been violated in the manufacture or sale of the items covered by this order.

Shipment must be made on the dates specified. We reserve the right to cancel or postpone deliveries of any material listed above which is not shipped to our plant at the time specified therefor.

Statement of account will be sent to our accounting department monthly or semimonthly for verification prior to payment, statement should list all items paid or unpaid, dating from the last statement rendered. Delay in receiving statement of invoices, also errors and omissions on statement, will be considered just cause for withholding settlement without losing cash discount privilege.

This agreement/purchase order/contract shall be construed and enforced in accordance with, and its terms and provisions and the rights and obligation of the parties are to be governed by, the law of the State of Florida.

Payments made by check only. NO DRAFTS WILL BE HONORED.

EQUAL EMPLOYMENT OPPORTUNITY CLAUSE

There is incorporated in this contract, and made a part hereof as if set forth at length herein, the provisions representing contractors' agreements with respect to non-discriminatory employment practices quoted in Sec. 202 of Executive Order 11246 of September 24, 1965 and the Rules and Regulations promulgated pursuant thereto including the order on Elimination of Segregated Facilities promulgated by the Secretary of Labor quoted in Sec. 32 of Federal Regulation 7439 of May 19, 1967. The Seller represents and warrants to the Buyer that the Seller has read said Executive Order and Federal Regulations and is fully informed of the Seller's responsibilities thereunder. The Seller represents that he does not maintain "segregated facilities" as defined in the Regulations. The Seller agrees that it will file Compliance Reports with such agencies, departments or offices, within such times, containing such information as to its practices, policies, programs and employment statistics, and in such form as the Secretary of Labor may prescribe. The Seller further agrees that it will from time to time, if and when Buyer requests, promptly furnish the Buyer with a certificate signed by the Seller to evidence its filing of required Compliance Reports or, at the election of the Buyer, signed copies of such Compliance Reports. The Seller/Contractor further agrees to execute and implement the Buyer's "Supplement to Contract and Purchase Order/Contractor's Certification" (herein incorporated by reference) and agrees that the provisions of that document are made a part of each contract and each Purchase Order which now exists or which may be entered into hereafter between the Seller/Contractor and Lykes Pasco, Inc.

OSHA STATEMENT

Your quotation is to include a statement of warranty that the equipment meets or exceeds standards of the Occupational Safety and Health Act of 1970. If unable to do so, list exceptions. If additional costs apply to meet required user OSHA standards, list such costs as a separate item.

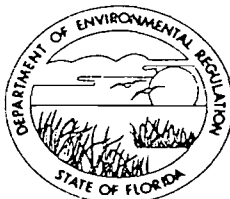
TOXIC SUBSTANCES

There is incorporated in this contract and made a part hereof as if set forth at length herein, the provisions of the Florida Right to Know Law, Chapter 442, Sections, 101-127, Florida Statutes, relating to a manufacturer, importer, or distributor (hereinafter called "seller") who is responsible for preparing and transmitting a "Material Safety Data Sheet," and/or any labeling requirement specified by the Act. The Seller warrants and represents to the Buyer that any substances that may be toxic are labeled pursuant to applicable federal and state law. The Seller represents and warrants that it is in compliance with Chapter 442, Florida Statutes, and with the OSHA Hazard Communication Standard, and further has prepared and will provide Buyer with a Material Safety Data Sheet (MSDS) for each and every toxic substance listed under this contract and that such MSDS is current, accurate, and complete. Seller further warrants that it will revise and communicate to Buyer on a timely basis any new information which would affect the contents of the existing MSDS.

AC 51-156207

\$ 300 pd
10-19-88
Do: 30: 11/17/88
\$ 200.00 pd
12-2-89

DEPARTMENT OF ENVIRONMENTAL REGULATION



RECEIVED

OCT 19 1988

DER-BAOM

APPLICATION TO ~~RENEW~~ CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: Coffee Roaster New¹ [] Existing¹

APPLICATION TYPE: Construction [] Operation [] Modification

COMPANY NAME: Lykes Pasco, Inc. COUNTY: Pasco

Identify the specific emission point source(s) addressed in this application (i.e. Lime No. 2 Coffee Roaster/ Cooler/Extractor)

SOURCE LOCATION: Street Highway 301 North City Dade City

UTM: East (17) 383.5 km North 3139.2 km

Latitude 28 ° 22 ' 32 "N Longitude 82 ° 11 ' 20 "W

APPLICANT NAME AND TITLE: Norvell W. Hunt, Director of Technical Services

APPLICANT ADDRESS: Lykes Pasco, Inc., P.O. Box 97, Dade City, Florida 33525

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

I am the undersigned owner or authorized representative* of Lykes Pasco, Inc.

I certify that the statements made in this application for a Construction permit are true, correct and complete to the best of my knowledge and belief. Further, I agree to maintain and operate the pollution control source and pollution control facilities in such a manner as to comply with the provision of Chapter 403, Florida Statutes, and all the rules and regulations of the department and revisions thereof. I also understand that a permit, if granted by the department, will be non-transferable and I will promptly notify the department upon sale or legal transfer of the permitted establishment.

*Attach letter of authorization

Signed: Norvell W. Hunt

Norvell W. Hunt, Dir. of Technical Services
Name and Title (Please Type)

Date: 10/6/88 Telephone No. 904/567-5211

B. PROFESSIONAL ENGINEER REGISTERED IN FLORIDA (where required by Chapter 471, F.S.)

This is to certify that the engineering features of this pollution control project have been ~~examined~~ examined by me and found to be in conformity with modern engineering principles applicable to the treatment and disposal of pollutants characterized in the permit application. There is reasonable assurance, in my professional judgment, that

¹ See Florida Administrative Code Rule 17-2.100(57) and (104)

the pollution control facilities, when properly maintained and operated, will discharge an effluent that complies with all applicable statutes of the State of Florida and the rules and regulations of the department. It is also agreed that the undersigned will furnish, if authorized by the owner, the applicant a set of instructions for the proper maintenance and operation of the pollution control facilities and, if applicable, pollution sources.



Signed _____

[Handwritten Signature]

John B. Koogler, Ph.D., P.E.

Name (Please Type)

Koogler & Associates, Environmental Services

Company Name (Please Type)

4014 N.W. 13th Street, Gainesville, Florida 32609

Mailing Address (Please Type)

Florida Registration No. 12925

Date: 9/30/88 Telephone No. 904/377-5822

SECTION II: GENERAL PROJECT INFORMATION

A. Describe the nature and extent of the project. Refer to pollution control equipment, and expected improvements in source performance as a result of installation. State whether the project will result in full compliance. Attach additional sheet if necessary.

See description on Page 2a of 12

B. Schedule of project covered in this application (Construction Permit Application Only)

Start of Construction November 1988 Completion of Construction February 1989

C. Costs of pollution control system(s): (Note: Show breakdown of estimated costs only for individual components/units of the project serving pollution control purposes. Information on actual costs shall be furnished with the application for operation permit.)

\$1500 - Chaff cyclone on roaster

\$2000 - Roasted coffee bean cyclone (cooler)

- Extractor blowdown cyclone - use cyclone on existing extractor line.

D. Indicate any previous DER permits, orders and notices associated with the emission point, including permit issuance and expiration dates.

Existing No. 1 Coffee Roaster/Extractor - AC51-62408; 4/21/83 - 9/25/83

" " - A051-71244; 9/27/83 - 9/10/88

" " - A051-149866; 8/29/88 - 8/25/93

SECTION II, A - GENERAL PROJECT INFORMATION

Lykes Pasco will install a second coffee roaster/extractor that will produce, as the final product, a concentrated liquid coffee extract that will be used in coffee vending machines. The system will be identical to a system that Lykes Pasco presently operates at this same facility and that is permitted under Permit A051-149866. In fact, the new system will use the existing roasted bean storage bin, blender and grinder (no emissions) and the existing extractor cyclone (particulate matter and steam).

The system will consist of a 300 pound batch coffee roaster supplied by Sivetz Coffee, Inc. The roaster will be direct-fired with natural gas at the rate of 1000 cubic feet per hour (one million BTU per hour heat input). The roaster has the capability of roasting 2.5 batches per hour; or is capable of a 750 pound per hour input rate of green coffee beans. The operation of the coffee roaster is described in Attachment 1.

During the roasting process, a process requiring approximately 20 minutes, the roaster is vented through a chaff cyclone. The gas stream discharged from the roaster includes the combustion products from the roaster combustion chamber, excess air supplied to the roaster, particles of chaff, and small quantities of aldehydes and organic gases that are released from the coffee beans. Visible emission observations conducted on the existing coffee roaster showed the average opacity of emissions to be 2.5 percent and the highest rolling six-minute average opacity to be five to six

percent. (Copies of visible emission observations conducted on the existing Lykes Pasco coffee roasting system in 1987 and 1988 are included in this application as Attachment 2.) It is estimated that the efficiency of the chaff cyclone for particulate matter control is 66 percent. It is further estimated that the particulate matter emission rate from the cyclone will be 1.0 pounds per hour.

3
from data?

At the end of the roasting cycle, a gate in the side of the coffee roaster is opened and the same blower that is used for supplying combustion air to the roaster pneumatically conveys the roasted coffee beans to a bean cooler. The bean cooler is a cyclonic device that discharges the cooling air through an 18 inch diameter stack to the atmosphere. Emissions from this cyclone include small quantities of particulate matter; estimated to be in the range of 0.2 pounds per hour.

2
pounds

The bottom of the bean cooler is an incline chute that transfers the coffee beans to an air-lift leg. The beans, which are quite light, are lifted up this leg and are discharged into a ~~de~~stoner bin. Stones and other heavy debris remain at the bottom of the air-lift leg and are removed periodically for disposal. The air stream that conveys the coffee beans up the air-lift leg and into the ~~de~~stoner bin is discharged through vents in the ~~de~~stoner bin. There are no significant emissions associated with this discharge.

From the ~~de~~stoner bin, the beans are transferred to the existing roasted bean storage bin and blender. From the blender, the beans are ground in the existing coffee grinder and transferred to the new second line coffee

extractors. The existing storage bin, blender and grinder are part of the existing coffee roasting system operated by Lykes Pasco (presently under permit A051-149866).

The extractors consist of a series of six vessels connected in a series. In these vessels, the coffee is extracted from a 450 pound batch of ground beans under elevated temperatures and pressures. The pressure in the final extractor is approximately 195 psig and the temperature is approximately 220°F. The total extraction cycle requires approximately 60 minutes. At the end of the cycle, the coffee concentrate is withdrawn from the final extractor and the extractor blow-down manifold is opened. The residual steam remaining in the final extractor (approximately 100 pounds of water vapor at a temperature of 220°F and a pressure of 195 psig) discharges the spent grounds to a spent grounds cyclone. This discharge occurs for only 10-15 seconds at the end of each one-hour extraction cycle. Visible emissions observations that have been conducted on the existing coffee line indicate no visible emissions (other than the steam plume) from the spent grounds cyclone during the blow-down period.

Since the blow-down period only requires 10-15 seconds at the end of each one-hour extraction cycle, the spent grounds cyclone on the existing coffee line (permitted under Permit A051-149866) will also be used for the new coffee line. The extraction cycles will be staggered so that only one extractor is blowing down at any one time.

The process flow diagram required by Section V. 6, shows the interconnection between the existing coffee line and the new coffee line.

Air pollutant emissions have been estimated for the new coffee line and are reported herein. The maximum annual emission rate of no single air pollutant exceeds the de minimus emission rates reported in Table 17-2.500-2,FAC. As a result, the proposed process does not require a PSD permit review. To facilitate the review of this permit application, and for consistency of permit requirements, a copy of the air permit for the existing coffee line is attached (Attachment 7).

The proposed coffee line will operate in compliance with all applicable emission limiting standards.

applied for
3

E. Requested permitted equipment operating time: hrs/day 24; days/wk 7; wks/yr 52; if power plant, hrs/yr _____; if seasonal, describe: Roaster and cooler could operate 8760 hrs/yr but will average about 7000 hrs/yr. The extractor will operate 8760 hrs/yr.

F. If this is a new source or major modification, answer the following questions. (Yes or No)

- 1. Is this source in a non-attainment area for a particular pollutant? NO
 - a. If yes, has "offset" been applied? -
 - b. If yes, has "Lowest Achievable Emission Rate" been applied? -
 - c. If yes, list non-attainment pollutants. -

2. Does best available control technology (BACT) apply to this source? NO*
If yes, see Section VI.

3. Does the State "Prevention of Significant Deterioration" (PSD) requirement apply to this source? If yes, see Sections VI and VII. NO*

4. Do "Standards of Performance for New Stationary Sources" (NSPS) apply to this source? NO

5. Do "National Emission Standards for Hazardous Air Pollutants" (NESHAP) apply to this source? NO

H. Do "Reasonably Available Control Technology" (RACT) requirements apply to this source? NO

a. If yes, for what pollutants? -

b. If yes, in addition to the information required in this form, any information requested in Rule 17-2.650 must be submitted.

Attach all supportive information related to any answer of "Yes". Attach any justification for any answer of "No" that might be considered questionable.

* Emission rate of all pollutants less than de minimus emission rate.

SECTION III: AIR POLLUTION SOURCES & CONTROL DEVICES (Other than Incinerators)

A. Raw Materials and Chemicals Used in your Process, if applicable:

Description	Contaminants		Utilization Rate - lbs/hr	Relate to Flow Diagram
	Type	% Wt		
<u>Roaster/Cooler</u>				
Green Coffee Beans	Part. Matter	0.4	750	A
<u>Extractor</u>				
Ground Roasted Coffee Beans	None	0	450	B

B. Process Rate, if applicable: (See Section V, Item 1)

- Total Process Input Rate (lbs/hr):** 750 lb/hr green beans to roaster; 640 lb/hr roasted beans to cooler; 450 lb/hr ground roasted beans to extractor.
- Product Weight (lbs/hr):** 640 lb/hr roasted beans from roaster; 640 lb/hr roasted beans from cooler; 450 lb/hr spent grounds and 100 lb/hr water vapor from extractor.

C. Airborne Contaminants Emitted: (Information in this table must be submitted for each emission point, use additional sheets as necessary)

Name of Contaminant	Emission ¹		Allowed Emission Rate per Rule 17-2	Allowable ³ Emission lbs/hr	Potential ⁴ Emission		Relate to Flow Diagram
	Maximum lbs/hr	Actual I/yr			lbs/yr	I/yr	
See Page 4a							

¹See Section V, Item 2.

²Reference applicable emission standards and units (e.g. Rule 17-2.600(5)(b)2. Table II, E. (1) - 0.1 pounds per million BTU heat input)

³Calculated from operating rate and applicable standard.

⁴Emission, if source operated without control (See Section V, Item 3).

SECTION III, C - AIRBORNE CONTAMINANTS

Source and Containment	Expected Emissions		Emission Standard	Allowable P.M. Emissions (1)		Uncontrolled Emissions		Relate to Flow Diagram
	(lb/hr)	(ton/yr)		(lb/hr)	(ton/yr)	(lb/hr)	(ton/yr)	
Roaster								
Part. Matter	1.0	3.8	17-2.610(1)	1.95	8.5	2.9	10.9	4
Nitrogen Oxides	<0.1	0.2	NA	-	-	<0.1	0.2	4
Aldehydes	<0.1	0.3	NA	-	-	<0.1	0.3	4
Organic Acids	0.3	1.3	NA	-	-	0.3	1.3	4
Cooler								
Part. Matter	0.2	0.7	17-2.610(1)	(2)	(2)	0.5	2.0	5
Extractor								
Part. Matter	1.4	6.2	17-2.610(1)	1.42	6.2	NA (3)	NA (3)	3
TOTAL PART. MATTER	2.6	10.7		3.4	14.7			

- (1) Allowable particulate matter emissions from the roaster and cooler combined were determined from Rule 17-2.610(1),FAC and are based on an input rate of 750 lb/hr of green beans to the roaster. The particulate matter emissions from the extractor are based on Rule 17-2.610(1),FAC and an input rate of 450 lb/hr of ground roasted beans.
- (2) Included in allowable roaster emissions.
- (3) See process description in Section V, 2/3.

D. Control Devices: (See Section V, Item 4)

Name and Type (Model & Serial No.)	Contaminant	Efficiency	Range of Particles Size Collected (in microns) (If applicable)	Basis for Efficiency (Section V Item 5)
Cyclone on roaster	Part. Matter	66%	> 15 um	Estimate
Cyclone on cooler	Part. Matter	66%	> 15 um	Estimate
Cyclone on extractor	Part. Matter	99.7%*	> 15 um	Estimate
* See note in Section	V.2/3			

E. Fuels

Type (Be Specific)	Consumption*		Maximum Heat Input (MMBTU/hr)
	avg/hr	max./hr	
Natural gas	1000 ft ³ /hr	1000 ft ³ /hr	1.0

*Units: Natural Gas--MMCF/hr; Fuel Oils--gallons/hr; Coal, wood, refuse, other--lbs/hr.

Fuel Analysis:

Percent Sulfur: Nil Percent Ash: NA
 Density: NA lbs/gal Typical Percent Nitrogen: NA
 Heat Capacity: 1025 BTU/ft³ BTU/lb NA BTU/gal
 Other Fuel Contaminants (which may cause air pollution): None

F. If applicable, indicate the percent of fuel used for space heating.

Annual Average NA Maximum

G. Indicate liquid or solid wastes generated and method of disposal.

Coffee grounds and chaff from the cyclones will be disposed of in the Lykes Pasco
land-fill. Water from the extractor will be treated in the Lykes Pasco water
treatment lagoons.

H. Emission Stack Geometry and Flow Characteristics (Provide data for each stack):

Stack Height: See Page 6a of 12 ft. Stack Diameter: _____ ft.
 Gas Flow Rate: _____ ACFM _____ DSCFM Gas Exit Temperature: _____ °F.
 Water Vapor Content: _____ % Velocity: _____ FPS

SECTION IV: INCINERATOR INFORMATION
 (Not Applicable)

Type of Waste	Type 0 (Plastics)	Type I (Rubbish)	Type II (Refuse)	Type III (Garbage)	Type IV (Pathological)	Type V (Liq. & Gas By-prod.)	Type VI (Solid By-prod.)
Actual lb/hr Incinerated							
Uncontrolled (lbs/hr)							

Description of Waste _____
 Total Weight Incinerated (lbs/hr) _____ Design Capacity (lbs/hr) _____
 Approximate Number of Hours of Operation per day _____ day/wk _____ wks/yr. _____
 Manufacturer _____
 Date Constructed _____ Model No. _____

	Volume (ft) ³	Heat Release (BTU/hr)	Fuel		Temperature (°F)
			Type	BTU/hr	
Primary Chamber					
Secondary Chamber					

Stack Height: _____ ft. Stack Diameter: _____ Stack Temp. _____
 Gas Flow Rate: _____ ACFM _____ DSCFM* Velocity: _____ FPS

*If 50 or more tons per day design capacity, submit the emissions rate in grains per standard cubic foot dry gas corrected to 50% excess air.

Type of pollution control device: Cyclone Wet Scrubber Afterburner
 Other (specify) _____

SECTION III, H - STACK PARAMETERS

Stack	Height (ft)	Flow Rate		Moisture (%)	Diameter (ft)	Stack Gas	Velocity (fps)
		Acfm	Dscfm			Temp. (°F)	
Roaster Cyclone	54	7575	4000	8-10	1.3	450	90.9
Cooler Cyclone	54	3000	2530	2-3	1.5	150	28.3
Extractor Cyclone	54	2750	20	99	2.0	220	14.6

NOTE: The final extractor operates under a pressure of approximately 195 psi and a temperature of approximately 220°F. The complete extraction cycle requires approximately one hour. At the end of the cycle, the coffee concentrate is withdrawn and the final extractor is opened to expel the grounds. The grounds (450 pounds) and approximately 2750 actual cubic feet of steam are discharged through a cyclone separator. The grounds are retained in the separator for subsequent disposal and the steam is discharged to the atmosphere.

Brief description of operating characteristics of control devices: _____

Ultimate disposal of any effluent other than that emitted from the stack (scrubber water, ash, etc.):

NOTE: Items 2, 3, 4, 6, 7, 8, and 10 in Section V must be included where applicable.

SECTION V: SUPPLEMENTAL REQUIREMENTS

(See Page 7a)

Please provide the following supplements where required for this application.

1. Total process input rate and product weight -- show derivation [Rule 17-2.100(127)]
2. To a construction application, attach basis of emission estimate (e.g., design calculations, design drawings, pertinent manufacturer's test data, etc.) and attach proposed methods (e.g., FR Part 60 Methods 1, 2, 3, 4, 5) to show proof of compliance with applicable standards. To an operation application, attach test results or methods used to show proof of compliance. Information provided when applying for an operation permit from a construction permit shall be indicative of the time at which the test was made.
3. Attach basis of potential discharge (e.g., emission factor, that is, AP42 test).
4. With construction permit application, include design details for all air pollution control systems (e.g., for baghouse include cloth to air ratio; for scrubber include cross-section sketch, design pressure drop, etc.)
5. With construction permit application, attach derivation of control device(s) efficiency. Include test or design data. Items 2, 3 and 5 should be consistent: actual emissions = potential (1-efficiency).
6. An 8 1/2" x 11" flow diagram which will, without revealing trade secrets, identify the individual operations and/or processes. Indicate where raw materials enter, where solid and liquid waste exit, where gaseous emissions and/or airborne particles are evolved and where finished products are obtained.
7. An 8 1/2" x 11" plot plan showing the location of the establishment, and points of airborne emissions, in relation to the surrounding area, residences and other permanent structures and roadways (Example: Copy of relevant portion of USGS topographic map).
8. An 8 1/2" x 11" plot plan of facility showing the location of manufacturing processes and outlets for airborne emissions. Relate all flows to the flow diagram.

SECTION V - SUPPLEMENTAL INFORMATION

1. PROCESS RATE

Roaster (Batch operation @ 24 minutes per batch)

Input - 300 pounds of green coffee beans per batch
 Batch Rate - 2.5 per hour (20 minute roast plus 4 minutes to transfer beans)
 Input Rate = 300 lb/hr X 2.5 batches/hr
 = 750 lb/hr of green coffee beans
 Output Rate - Assume 15% weight loss during roasting
 = 750 (1-0.15)
 = 640 lb/hr roasted coffee beans

Cooler (Receives roasted beans from roaster at end of roast cycle)

Cooler Input = Cooler Output = 640 pounds per hour

Extractor (Batch operation @ 60 minutes per batch)

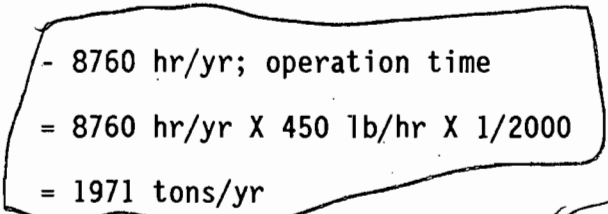
Extractor Input = 450 pounds per hour of ground roasted beans
 Extractor Output = Coffee concentrate wet grounds (450 lb/hr dry wt. and 100 lb/hr steam)

2/3. CONTROLLED AND UNCONTROLLED EMISSIONS

HOURS OF OPERATION

Extractor - 8760 hr/yr; operation time
 Bean Usage = 8760 hr/yr X 450 lb/hr X 1/2000
 = 1971 tons/yr

Assume 10% Loss in destoner and grinder
 = 1971 / (1-0.10)
 = 2200 tons/yr



*11 stones / 1000 lb
 separate process
 steam extraction*

*2
 → 502.3 lbs/hr
 ↓
 @ 2400 T/yr → 547.9 lbs/hr*

$[1500-6475] \times 640$
 $= 400,000 \text{ lbs}$
 $= 200 \text{ Tons}$

Roaster/Cooler (at 640 lb/hr roasted beans)
Operating Time = 2200 tpy X 2000 lb/ton/640 lb/hr
= 6875 hr/yr
Say 7500 hr/yr

vs 8760
vs 698.2 lb/hr
or 2400 TPY

EMISSION RATES

Roaster (AP-42, Sect. 6.2, See Page 7e)

Particulate Matter

Uncontrolled @ 7.6 lb/ton of beans
= 7.6 X (750/2000)
= 2.9 lb/hr
X 7500 hr/yr X 1/2000 lb/ton
= 10.9 tpy

06875

6159 hrs/yr X 1640
1671

Controlled (Assume 66% efficiency)
= 2.9 lb/hr (1-0.66)
= 1.0 lb/hr
X 7500/2000
= 3.8 tpy

from what data?

#1 est @ 99%

Nitrogen Oxides

Controlled and Uncontrolled
= 0.1 X (750/2000)
= 0.04 lb/hr
X 7500/2000
= 0.2 tpy

Aldehydes

Controlled and Uncontrolled

= 0.2 X (750/2000)

= 0.08 lb/hr

X 7500/2000

= 0.3 tpy

Organic Acids

Controlled and Uncontrolled

= 0.9 X (750/2000)

= 0.3 lb/hr

X 7500/2000

= 1.3 tpy

Cooler (AP-42, Section 6.2, See Page 5d)

Particulate Matter

Uncontrolled

= 1.4 lb/ton X (750/2000)

= 0.51 lb/hr

X 7500/2000

= 2.0 tpy

Controlled (Assume 66% efficiency)

= 0.5 (1-0.66)

= 0.2 lb/hr

X 7500/2000

= 0.7 tpy

see "C" under notes for Table 6.2-1:

W cyclone (is a) @ 70% reduction:

∴, 0.42 lbs/ton

X 750/2000

= 0.158 lb/hr

vs 70%

Extractor

Particulate Matter

Approximately 450 pounds of wet coffee grounds are ejected from the extractor by steam at a pressure of approximately 195 psig at the end of each 60-minute extraction cycle. The release time is about 10-15 seconds; during which time the wet grounds and approximately 2750 cubic feet of steam at a temperature of 220°F are discharged to the extractor cyclone. The grounds are collected in the cyclone for subsequent disposal and the steam is released to the atmosphere.

Particulate matter emissions from the existing extractor blow-down are limited by an opacity standard of 20 percent or less and a mass particulate matter emission limit. A surrogate test method allows compliance with the emission limiting standards to be demonstrated by maintaining the opacity of emissions below five percent. Compliance tests have consistently demonstrated no visible emissions during the extraction cycle or during grounds blow-down (see 1987 and 1988 test results in Attachment 2). Based on the fact that no visible emissions have been observed, controlled particulate matter emissions have been estimated at 1.4 pounds per blow-down (equivalent to 1.4 lb/hr). This is a 99.7% cyclone efficiency for all grounds discharged into the cyclone.

Controlled Emissions

$$\begin{aligned} &= 1.4 \text{ lb/hr} \\ &\quad \times 8760/2000 \\ &= 6.2 \text{ tpy} \end{aligned}$$

4. CYCLONE SPECIFICATIONS (Attachment 3)

5. EFFICIENCIES

Chaff Cyclone - Estimated to be 66%

Roaster Cyclone - Estimated to be 66%

Extractor Cyclone - See Section 3 above

6. FLOW DIAGRAM (Attachment 4)

7. LOCATION MAP (Attachment 5)

8. PLOT PLAN (Attachment 6)

6.2 COFFEE ROASTING

6.2.1 Process Description^{1,2}

Coffee, which is imported in the form of green beans, must be cleaned, blended, roasted, and packaged before being sold. In a typical coffee roasting operation, the green coffee beans are freed of dust and chaff by dropping the beans into a current of air. The cleaned beans are then sent to a batch or continuous roaster. During the roasting, moisture is driven off, the beans swell, and chemical changes take place that give the roasted beans their typical color and aroma. When the beans have reached a certain color, they are quenched, cooled, and stoned.

6.2.2 Emissions^{1,2}

Dust, chaff, coffee bean oils (as mists), smoke, and odors are the principal air contaminants emitted from coffee processing. The major source of particulate emissions and practically the only source of aldehydes, nitrogen oxides, and organic acids is the roasting process. In a direct-fired roaster, gases are vented without recirculation through the flame. In the indirect-fired roaster, however, a portion of the roaster gases are recirculated and particulate emissions are reduced. Emissions of both smoke and odors from the roasters can be almost completely removed by a properly designed afterburner.^{1,2}

Particulate emissions also occur from the stoner and cooler. In the stoner, contaminating materials heavier than the roasted beans are separated from the beans by an air stream. In the cooler, quenching the hot roasted beans with water causes emissions of large quantities of steam and some particulate matter.³ Table 6.2-1 summarizes emissions from the various operations involved in coffee processing.

Table 6.2-1. EMISSION FACTORS FOR ROASTING PROCESSES WITHOUT CONTROLS
EMISSION FACTOR RATING: B

Type of process	Pollutant							
	Particulates ^a		NO _x ^b		Aldehydes ^b		Organic acids ^b	
	lb/ton	kg/MT	lb/ton	kg/MT	lb/ton	kg/MT	lb/ton	kg/MT
Roaster								
Direct-fired	7.6	3.8	0.1	0.05	0.2	0.1	0.9	0.45
Indirect-fired	4.2	2.1	0.1	0.05	0.2	0.1	0.9	0.45
Stoner and cooler ^c	1.4	0.7	—	—	—	—	—	—
Instant coffee spray dryer	1.4 ^d	0.7 ^d	—	—	—	—	—	—

^aReference 3.

^bReference 1.

^cIf cyclone is used, emissions can be reduced by 70 percent.

^dCyclone plus wet scrubber always used, representing a controlled factor.

0.42 lb/ton

9. The appropriate application fee in accordance with Rule 17-4.05. The check should be made payable to the Department of Environmental Regulation.
10. With an application for operation permit, attach a Certificate of Completion of Construction indicating that the source was constructed as shown in the construction permit.

SECTION VI: BEST AVAILABLE CONTROL TECHNOLOGY
(Not Applicable)

A. Are standards of performance for new stationary sources pursuant to 40 C.F.R. Part 60 applicable to the source?

Yes No

Contaminant	Rate or Concentration
-------------	-----------------------

B. Has EPA declared the best available control technology for this class of sources (If yes, attach copy)

Yes No

Contaminant	Rate or Concentration
-------------	-----------------------

C. What emission levels do you propose as best available control technology?

Contaminant	Rate or Concentration
-------------	-----------------------

D. Describe the existing control and treatment technology (if any).

- | | |
|---------------------------|--------------------------|
| 1. Control Device/System: | 2. Operating Principles: |
| 3. Efficiency:* | 4. Capital Costs: |

*Explain method of determining

5. Useful Life:

6. Operating Costs:

7. Energy:

8. Maintenance Cost:

9. Emissions:

Contaminant	Rate or Concentration

10. Stack Parameters

- a. Height: ft. b. Diameter: ft.
- c. Flow Rate: ACFM d. Temperature: °F.
- e. Velocity: FPS

E. Describe the control and treatment technology available (As many types as applicable, use additional pages if necessary).

1.

- a. Control Device: b. Operating Principles:
- c. Efficiency:¹ d. Capital Cost:
- e. Useful Life: f. Operating Cost:
- g. Energy:² h. Maintenance Cost:
- i. Availability of construction materials and process chemicals:
- j. Applicability to manufacturing processes:
- k. Ability to construct with control device, install in available space, and operate within proposed levels:

2.

- a. Control Device: b. Operating Principles:
- c. Efficiency:¹ d. Capital Cost:
- e. Useful Life: f. Operating Cost:
- g. Energy:² h. Maintenance Cost:
- i. Availability of construction materials and process chemicals:

¹Explain method of determining efficiency.

²Energy to be reported in units of electrical power - KWH design rate.

- j. Applicability to manufacturing processes:
- k. Ability to construct with control device, install in available space, and operate within proposed levels:

3.

- a. Control Device:
- b. Operating Principles:
- c. Efficiency:¹
- d. Capital Cost:
- e. Useful Life:
- f. Operating Cost:
- g. Energy:²
- h. Maintenance Cost:
- i. Availability of construction materials and process chemicals:
- j. Applicability to manufacturing processes:
- k. Ability to construct with control device, install in available space, and operate within proposed levels:

4.

- a. Control Device:
- b. Operating Principles:
- c. Efficiency:¹
- d. Capital Costs:
- e. Useful Life:
- f. Operating Cost:
- g. Energy:²
- h. Maintenance Cost:
- i. Availability of construction materials and process chemicals:
- j. Applicability to manufacturing processes:
- k. Ability to construct with control device, install in available space, and operate within proposed levels:

F. Describe the control technology selected:

- 1. Control Device:
- 2. Efficiency:¹
- 3. Capital Cost:
- 4. Useful Life:
- 5. Operating Cost:
- 6. Energy:²
- 7. Maintenance Cost:
- 8. Manufacturer:
- 9. Other locations where employed on similar processes:
- a. (1) Company:
- (2) Mailing Address:
- (3) City:
- (4) State:

¹Explain method of determining efficiency.

²Energy to be reported in units of electrical power - KWH design rate.

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:¹

Contaminant

Rate or Concentration

(8) Process Rate:¹

b. (1) Company:

(2) Mailing Address:

(3) City:

(4) State:

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:¹

Contaminant

Rate or Concentration

(8) Process Rate:¹

10. Reason for selection and description of systems:

¹Applicant must provide this information when available. Should this information not be available, applicant must state the reason(s) why.

SECTION VII - PREVENTION OF SIGNIFICANT DETERIORATION

(Not Applicable)

A. Company Monitored Data

1. _____ no. sites _____ TSP _____ () SO₂* _____ Wind spd/dir

Period of Monitoring _____ / _____ / _____ to _____ / _____ / _____
month day year month day year

Other data recorded _____

Attach all data or statistical summaries to this application.

*Specify bubbler (B) or continuous (C).

2. Instrumentation, Field and Laboratory

- a. Was instrumentation EPA referenced or its equivalent? [] Yes [] No
- b. Was instrumentation calibrated in accordance with Department procedures?
[] Yes [] No [] Unknown

B. Meteorological Data Used for Air Quality Modeling

- 1. _____ Year(s) of data from _____ / _____ / _____ to _____ / _____ / _____
month day year month day year
- 2. Surface data obtained from (location) _____
- 3. Upper air (mixing height) data obtained from (location) _____
- 4. Stability wind rose (STAR) data obtained from (location) _____

C. Computer Models Used

- 1. _____ Modified? If yes, attach description.
- 2. _____ Modified? If yes, attach description.
- 3. _____ Modified? If yes, attach description.
- 4. _____ Modified? If yes, attach description.

Attach copies of all final model runs showing input data, receptor locations, and principle output tables.

D. Applicants Maximum Allowable Emission Data

Pollutant	Emission Rate
TSP	_____ grams/sec
SO ²	_____ grams/sec

E. Emission Data Used in Modeling

Attach list of emission sources. Emission data required is source name, description of point source (on NEDS point number), UTM coordinates, stack data, allowable emissions, and normal operating time.

F. Attach all other information supportive to the PSD review.

G. Discuss the social and economic impact of the selected technology versus other applicable technologies (i.e., jobs, payroll, production, taxes, energy, etc.). Include assessment of the environmental impact of the sources.

H. Attach scientific, engineering, and technical material, reports, publications, journals, and other competent relevant information describing the theory and application of the requested best available control technology.

ATTACHMENT 1

Roasting Process Description

ROASTING PROCESS

U. S. PATENT 3.964.175

SIVETZ COFFEE, Inc.
COFFEE BEAN ROASTING MACHINES
ENGINEERING & CONSULTING
349 S.W. 4th ST
CORVALLIS, OREGON 97333 — U.S.A.
(503) 753-9713

After the equipment is mechanically and electrically installed, weigh in the 300 lbs green coffee beans, start the blower and heating. The beans will vigorously spout up along the wall and fall over away from the wall causing a smooth rotary motion with spouts moving back and forth along wall.

Since coffee bean sizes, shapes and density vary, and this is a continuing variable, do not vary other process conditions like inlet air temperature, loading weights, air flow damper positions, etc. and always be present to be sure beans are moving.

Stoppage of bean movement can cause overheating of the lower beans and fire. Procedures must be in place to deal with stoppage of bean movement and fires.

As the coffee beans warm up, they lose moisture, become lighter and spouting increases. Most moisture is lost by 350°F, and pyrolysis, or decomposition of sucrose in the bean begins at near 390°F, accompanied by great amount of chaff release, and bean expansion (up to 80%), up to 440°F and 470°F. Refer to Roasting Process Chart.

Levitation of the beans is greater as they swell in size and become less dense, meanwhile levitation forces are less as inlet air temperature rises. Inlet air temperatures must not exceed 550°F at the end of the roast, and blower impeller may be warped and distorted if it's exposed to near 600°F.

An interlocking pressure switch on the inlet air stream blower inlet probe will prevent gas heating, unless the blower is working and creating air pressure. This is an essential safety interlock.

When the roasted beans reach the set temperature, the controller will automatically and immediately cut off the gas heat, and close the inlet air flow damper to reduce air flow so as not to blow out the lighter density and larger sized beans as inlet air cools and becomes denser.

A few minutes water cooling will stop the roast process within 15 seconds minimizing bean temp. 'over-ride' over 'set' point, and will rapidly reduce bean temperatures to below 300°F, preferably down to ^{below} 200°F before discharging the beans to the de-stoner cyclone for air cooling in transfer from boot to overhead bin.

All roasted beans must be blown out of roast chamber, before new ^{bean} batch ^{is} added. Roast weight losses measured are an important confirmation to end bean temp.

WJ 9-1-87

ATTACHMENT 2

Visible Emissions Observations Reports
For 1987 and 1988 on Existing Coffee Line

KOGLER AND ASSOCIATES ENVIRONMENTAL SERVICES
 SUMMARY OF VISIBLE EMISSIONS

PLANT : LYKES PASCO
 SOURCE: BLOWDOWN DISCHARGE
 DATE : 7-9-87
 TIME : 1030-1100

MINUTES	VISIBLE EMISSION DATA				SIX-MINUTE AVG
1	0	0	0	0	0.00
2	0	0	0	0	
3	0	0	0	0	
4	0	0	0	0	
5	0	0	0	0	
6	0	0	0	0	
7	0	0	0	0	0.00
8	0	0	0	0	
9	0	0	0	0	
10	0	0	0	0	
11	0	0	0	0	
12	0	0	0	0	
13	0	0	0	0	0.00
14	0	0	0	0	
15	0	0	0	0	
16	0	0	0	0	
17	0	0	0	0	
18	0	0	0	0	
19	0	0	0	0	0.00
20	0	0	0	0	
21	0	0	0	0	
22	0	0	0	0	
23	0	0	0	0	
24	0	0	0	0	
25	0	0	0	0	0.00
26	0	0	0	0	
27	0	0	0	0	
28	0	0	0	0	
29	0	0	0	0	
30	0	0	0	0	

AVERAGE OPACITY: 0.0

HIGHEST ROLLING SIX-MINUTE AVERAGE: 0.0

STATE OF FLORIDA
 DEPARTMENT OF ENVIRONMENTAL REGULATION



THIS IS TO CERTIFY THAT

THOMAS E. BARTLEY HAS COMPLETED THE
 STATE OF FLORIDA VISIBLE EMISSIONS EVALUATION TRAINING
 EPA REFERENCE METHOD 9. Dec 2, 1987
 THIS CERTIFICATE EXPIRES

Judi Seaw CERTIFICATE OFFICER
Thomas E. Bartley BEARER'S SIGNATURE

**KOGLER AND ASSOCIATES ENVIRONMENTAL SERVICES
SUMMARY OF VISIBLE EMISSIONS**

PLANT : LYKES PASCO
SOURCE: COFFEE ROASTER
DATE : 7-9-87
TIME : 1100-1130

MINUTES	VISIBLE EMISSION DATA				SIX-MINUTE AVG
1	0	0	0	0	1.67
2	0	0	0	5	
3	0	5	0	0	
4	0	0	5	5	
5	5	0	5	5	
6	5	0	0	0	
7	0	0	5	5	5.42
8	5	5	5	5	
9	5	5	5	5	
10	5	10	5	5	
11	5	5	10	5	
12	5	5	10	10	
13	10	5	5	5	2.08
14	5	0	5	5	
15	5	0	0	0	
16	0	0	0	0	
17	0	0	0	0	
18	5	0	0	0	
19	0	0	0	0	0.00
20	0	0	0	0	
21	0	0	0	0	
22	0	0	0	0	
23	0	0	0	0	
24	0	0	0	0	
25	0	0	0	0	0.00
26	0	0	0	0	
27	0	0	0	0	
28	0	0	0	0	
29	0	0	0	0	
30	0	0	0	0	

AVERAGE OPACITY: 1.8

HIGHEST ROLLING SIX-MINUTE AVERAGE: 6.0



THIS IS TO CERTIFY THAT

THOMAS E. BARTLEY HAS COMPLETED THE
STATE OF FLORIDA VISIBLE EMISSIONS EVALUATION TRAINING
EPA REFERENCE METHOD 9. Dec 2, 1987
THIS CERTIFICATE EXPIRES

Judi Seaw CERTIFICATE OFFICER *Thomas E. Bartley* BEARER'S SIGNATURE

**KOGLER AND ASSOCIATES ENVIRONMENTAL SERVICES
SUMMARY OF VISIBLE EMISSIONS**

PLANT : LYKES PASCO
SOURCE: COFFEE BEAN COOLER
DATE : 7-9-87
TIME : 1130-1200

MINUTES	VISIBLE EMISSION DATA				SIX-MINUTE AVG
1	0	0	0	0	0.00
2	0	0	0	0	
3	0	0	0	0	
4	0	0	0	0	
5	0	0	0	0	
6	0	0	0	0	
7	0	0	0	0	0.00
8	0	0	0	0	
9	0	0	0	0	
10	0	0	0	0	
11	0	0	0	0	
12	0	0	0	0	
13	0	0	0	0	0.00
14	0	0	0	0	
15	0	0	0	0	
16	0	0	0	0	
17	0	0	0	0	
18	0	0	0	0	
19	0	0	0	0	0.00
20	0	0	0	0	
21	0	0	0	0	
22	0	0	0	0	
23	0	0	0	0	
24	0	0	0	0	
25	0	0	0	0	0.00
26	0	0	0	0	
27	0	0	0	0	
28	0	0	0	0	
29	0	0	0	0	
30	0	0	0	0	

AVERAGE OPACITY: 0.0

HIGHEST ROLLING SIX-MINUTE AVERAGE: 0.0



THIS IS TO CERTIFY THAT

THOMAS E. BARTLEY HAS COMPLETED THE
STATE OF FLORIDA VISIBLE EMISSIONS EVALUATION TRAINING
EPA REFERENCE METHOD 9. Dec 2, 1987
THIS CERTIFICATE EXPIRES

Josie Sears CERTIFICATE OFFICER *Thomas E. Bartley* BEARER'S SIGNATURE

KODGLER AND ASSOCIATES ENVIRONMENTAL SERVICES
SUMMARY OF VISIBLE EMISSIONS

PLANT : LYKES PASCO DADE CITY, FLA.
SOURCE: COFFEE BLOWDOWN
DATE : 2/10/88
TIME : 1540-1610

MINUTES	VISIBLE EMISSION DATA				SIX-MINUTE AVG
1	0	0	0	0	0.00
2	0	0	0	0	
3	0	0	0	0	
4	0	0	0	0	
5	0	0	0	0	
6	0	0	0	0	
7	0	0	0	0	0.00
8	0	0	0	0	
9	0	0	0	0	
10	0	0	0	0	
11	0	0	0	0	
12	0	0	0	0	
13	0	0	0	0	0.00
14	0	0	0	0	
15	0	0	0	0	
16	0	0	0	0	
17	0	0	0	0	
18	0	0	0	0	
19	0	0	0	0	0.00
20	0	0	0	0	
21	0	0	0	0	
22	0	0	0	0	
23	0	0	0	0	
24	0	0	0	0	
25	0	0	0	0	0.00
26	0	0	0	0	
27	0	0	0	0	
28	0	0	0	0	
29	0	0	0	0	
30	0	0	0	0	

AVERAGE OPACITY: 0.0

HIGHEST ROLLING SIX-MINUTE AVERAGE: 0.0

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

THIS IS TO CERTIFY THAT

THOMAS E. BARTLEY has completed the STATE OF FLORIDA visible emissions evaluation training and is a qualified observer of visible emissions as specified by EPA reference method 9.

THIS CERTIFICATE EXPIRES Jun 1, 1988

Michael R. Clark
CERTIFICATE OFFICER

TE Bartley
BEARER'S SIGNATURE

KOGLER AND ASSOCIATES ENVIRONMENTAL SERVICES
SUMMARY OF VISIBLE EMISSIONS

PLANT : LYKES PASCO DADE CITY, FLA.
SOURCE: COFFEE ROASTER
DATE : 2/10/88
TIME : 1615-1645

MINUTES	VISIBLE EMISSION DATA				SIX-MINUTE AVG
1	5	5	5	5	5.21
2	5	5	10	5	
3	5	5	5	5	
4	5	5	5	5	
5	5	5	5	5	
6	5	5	5	5	
7	10	5	5	5	5.21
8	5	5	5	5	
9	5	5	5	5	
10	5	5	5	5	
11	5	5	5	5	
12	5	5	5	5	
13	5	5	5	5	1.04
14	0	0	0	0	
15	0	0	0	0	
16	0	0	5	0	
17	0	0	0	0	
18	0	0	0	0	
19	0	0	0	5	0.83
20	5	0	0	0	
21	0	0	0	0	
22	0	0	0	5	
23	0	5	0	0	
24	0	0	0	0	
25	0	0	0	0	0.00
26	0	0	0	0	
27	0	0	0	0	
28	0	0	0	0	
29	0	0	0	0	
30	0	0	0	0	

AVERAGE OPACITY: 2.5

HIGHEST ROLLING SIX-MINUTE AVERAGE: 5.4



THIS IS TO CERTIFY THAT

THOMAS E. BARTLEY has completed the STATE OF FLORIDA visible emissions evaluation training and is a qualified observer of visible emissions as specified by EPA reference method 9.

THIS CERTIFICATE EXPIRES Jun 1, 1988

Michael R. Clark CERTIFICATE OFFICER
TE Bartley BEARER'S SIGNATURE

KOOGLER AND ASSOCIATES ENVIRONMENTAL SERVICES
SUMMARY OF VISIBLE EMISSIONS

PLANT : LYKES PASCO DADE CITY, FLA.
SOURCE: COFFEE BEAN COOLER
DATE : 2/11/88
TIME : 1346-1416

MINUTES	VISIBLE EMISSION DATA				SIX-MINUTE AVG
1	0	0	0	0	0.00
2	0	0	0	0	
3	0	0	0	0	
4	0	0	0	0	
5	0	0	0	0	
6	0	0	0	0	
7	0	0	0	0	0.00
8	0	0	0	0	
9	0	0	0	0	
10	0	0	0	0	
11	0	0	0	0	
12	0	0	0	0	
13	0	0	0	0	0.00
14	0	0	0	0	
15	0	0	0	0	
16	0	0	0	0	
17	0	0	0	0	
18	0	0	0	0	
19	0	0	0	0	0.00
20	0	0	0	0	
21	0	0	0	0	
22	0	0	0	0	
23	0	0	0	0	
24	0	0	0	0	
25	0	0	0	0	0.00
26	0	0	0	0	
27	0	0	0	0	
28	0	0	0	0	
29	0	0	0	0	
30	0	0	0	0	

AVERAGE OPACITY: 0.0

HIGHEST ROLLING SIX-MINUTE AVERAGE: 0.0



THIS IS TO CERTIFY THAT

THOMAS E. BARTLEY has completed the STATE OF FLORIDA visible emissions evaluation training and is a qualified observer of visible emissions as specified by EPA reference method 9.

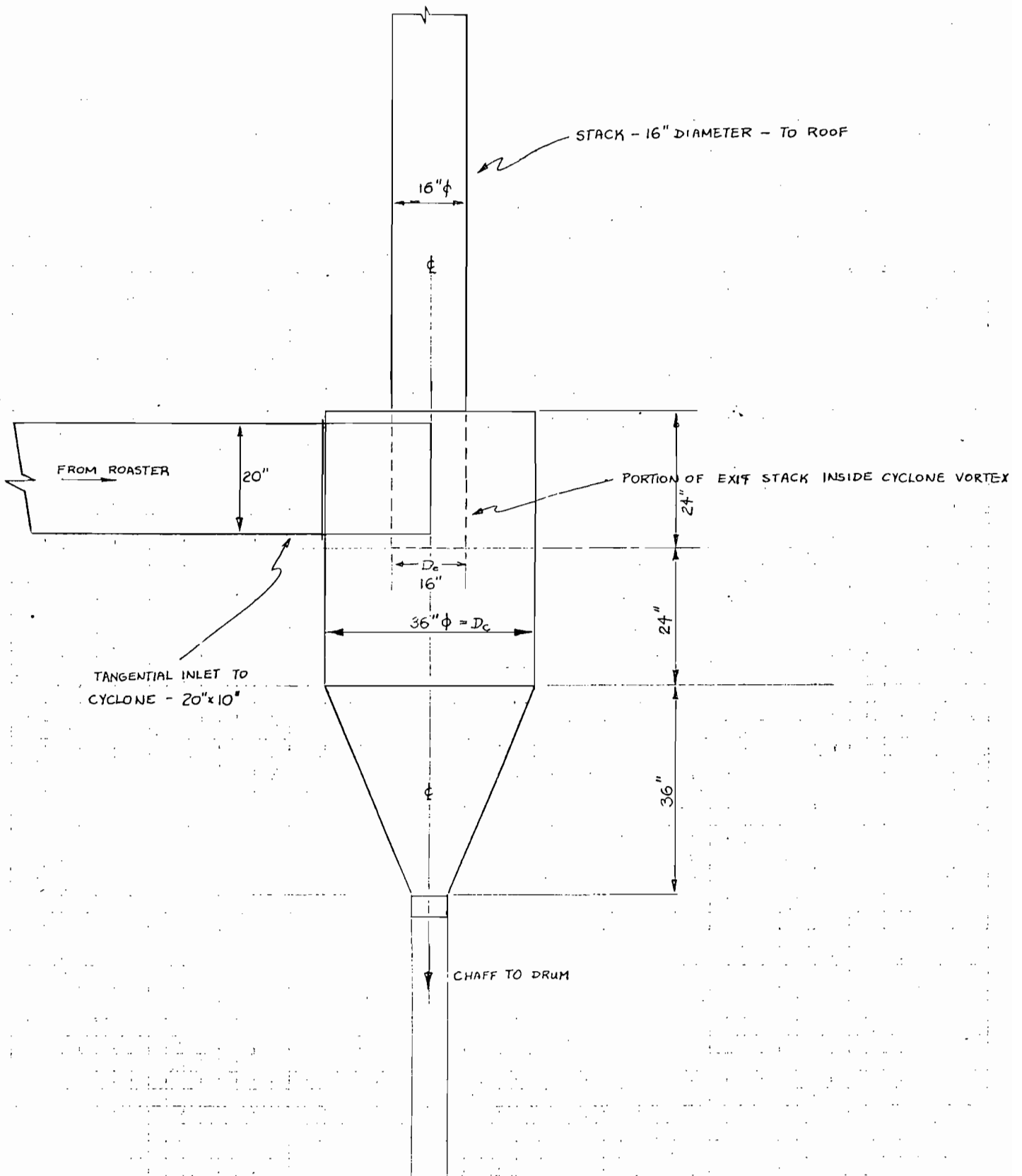
THIS CERTIFICATE EXPIRES Jun 1, 1988

Michael R. Clark
CERTIFICATE OFFICER

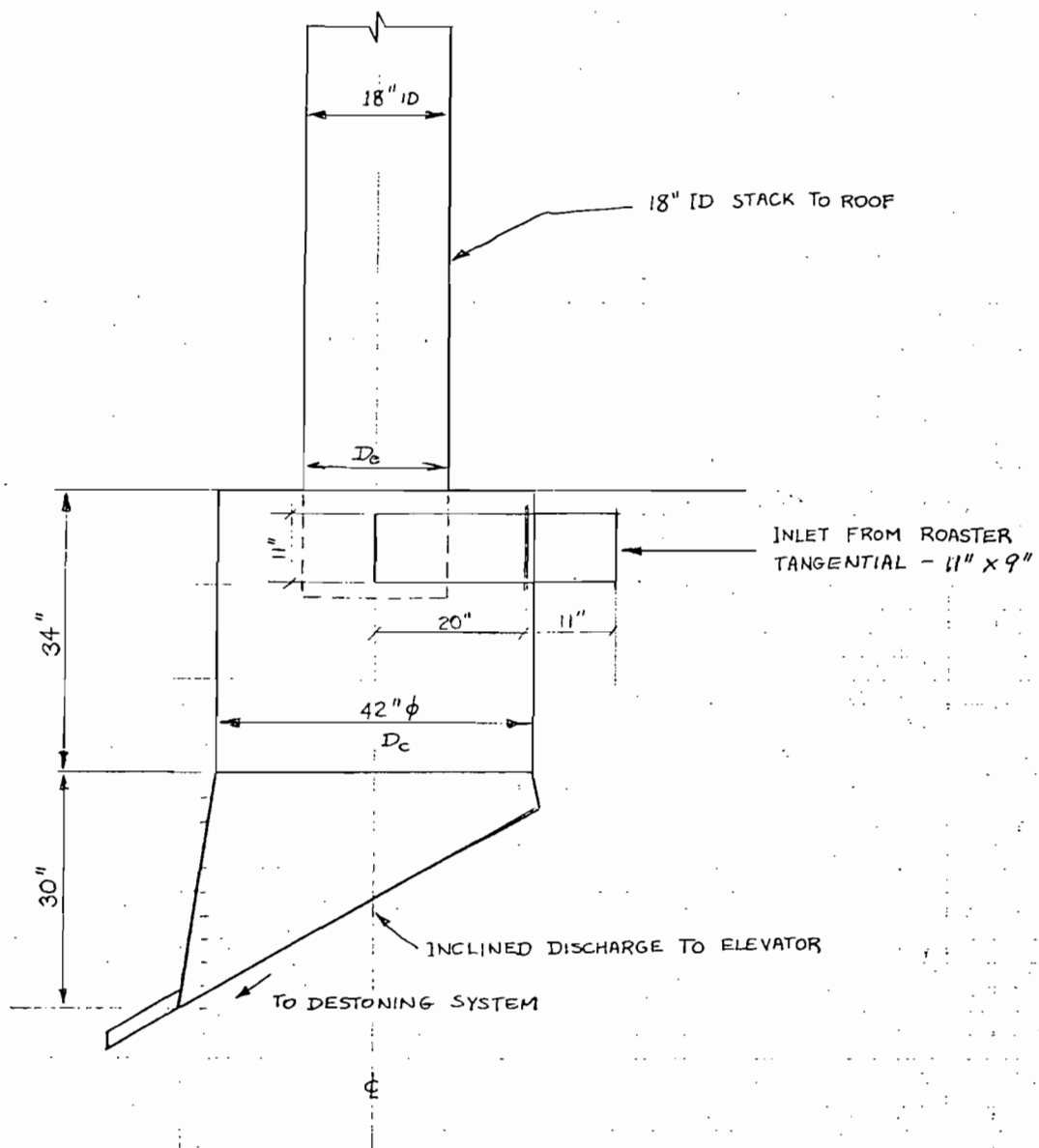
TE Bartley
BEARER'S SIGNATURE

ATTACHMENT 3

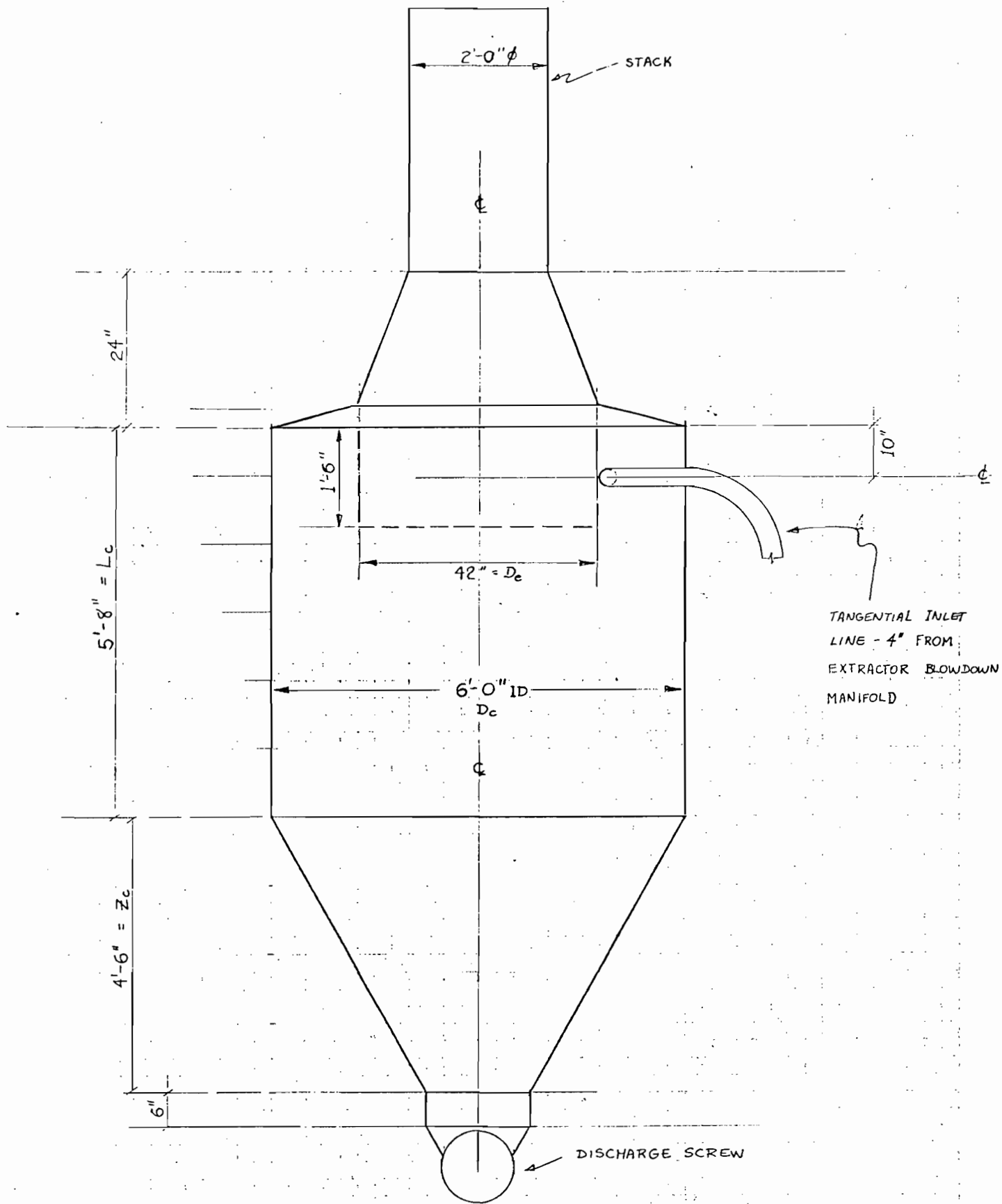
Cyclone Specifications
and Specifications for
Roaster Combustion Chamber Fan



ROASTER CHAFF CYCLONE



ROASTER COOLER CYCLONE



EXTRACT CYCLONE

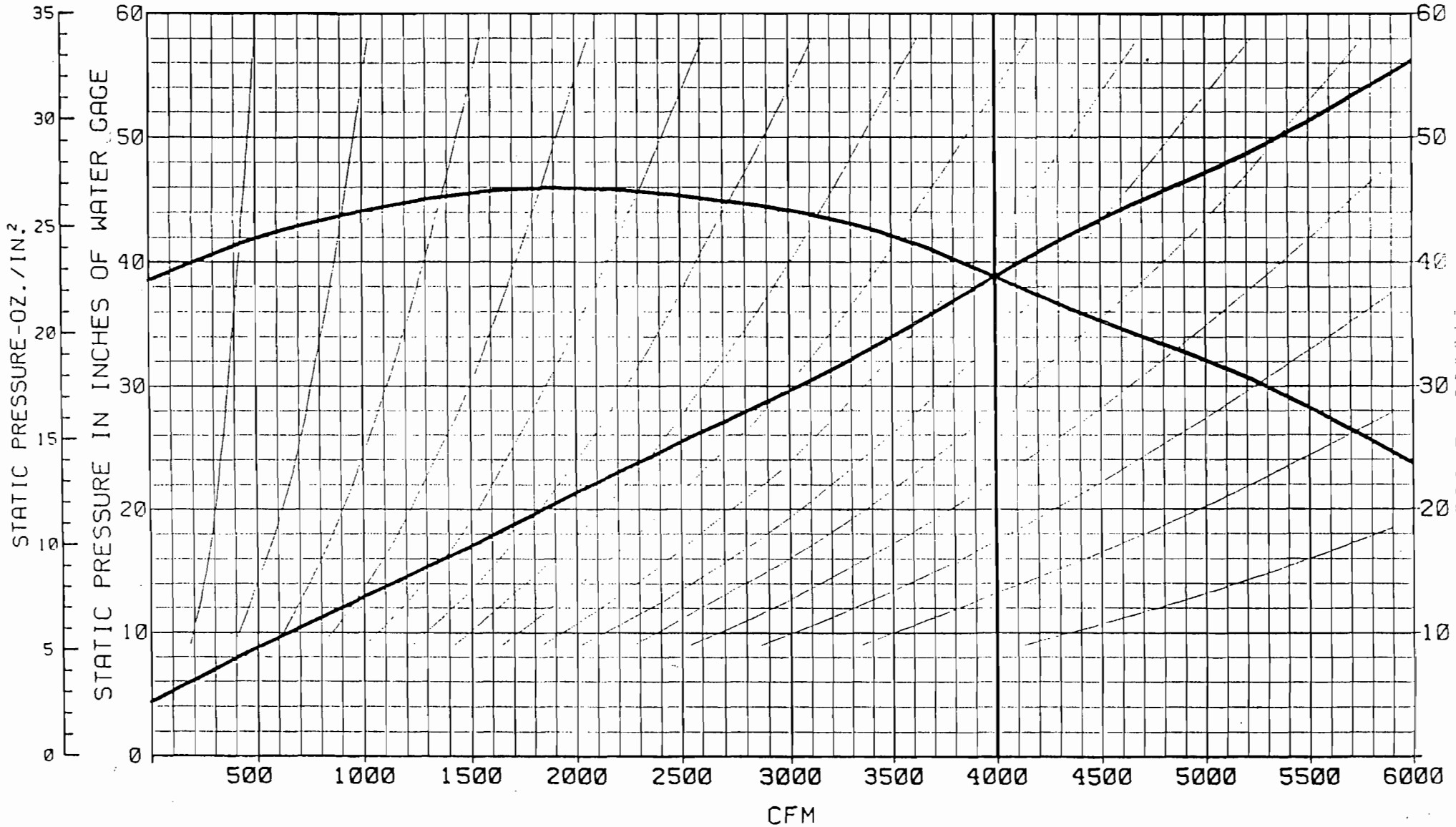


The
New York Blower
Company

PERFORMANCE CURVE

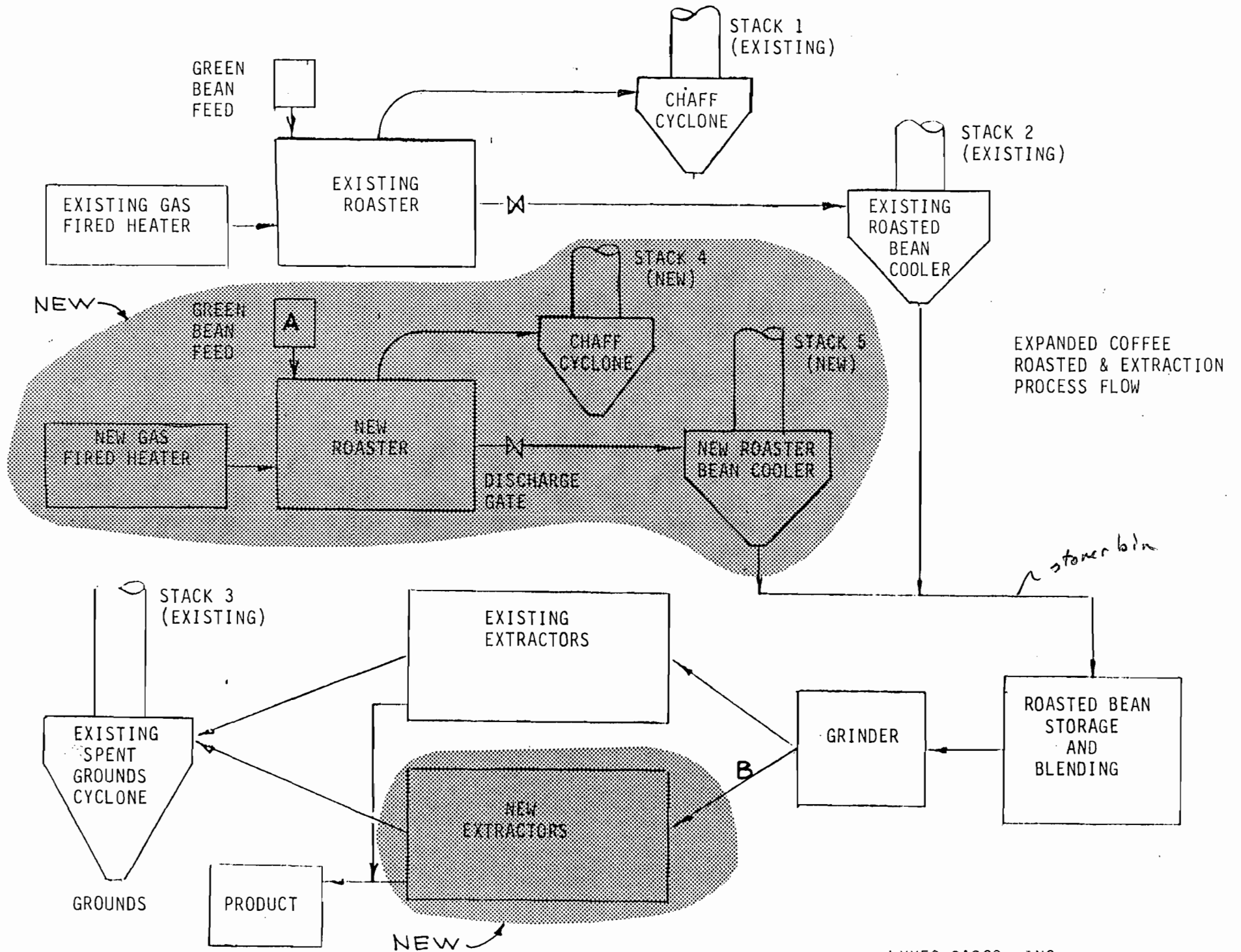
CUSTOMER'S NO. 653
CUSTOMER SIVETZ COFFEE ENTERPRISES
TAGGING _____
FILE NO. D-7221 DATE August 4, 1988

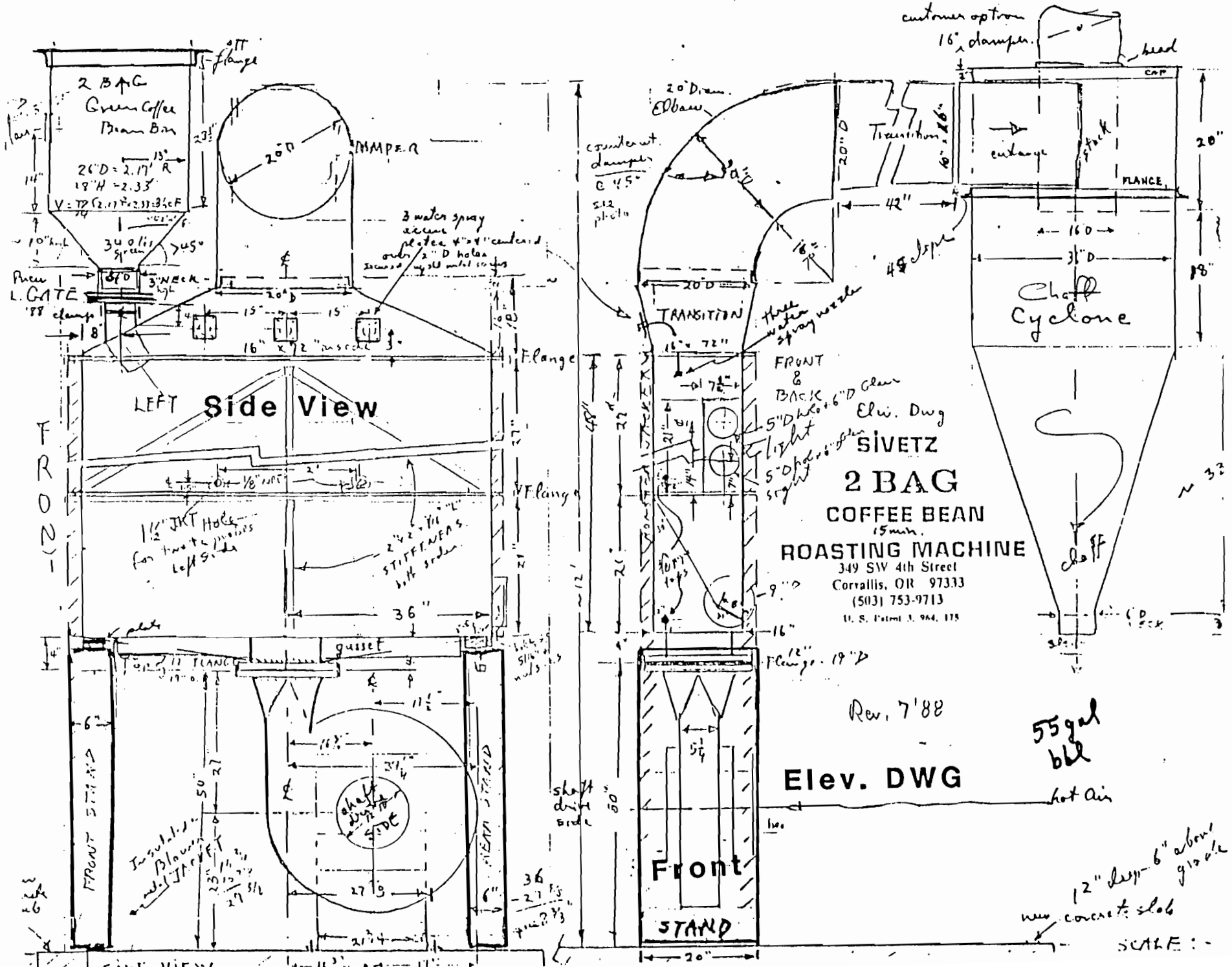
SIZE 2312S TYPE PRESSURE BLOWER
4000 CFM AT 39 "SP AT 70 F.
AT 3550 RPM AT 39 BHP



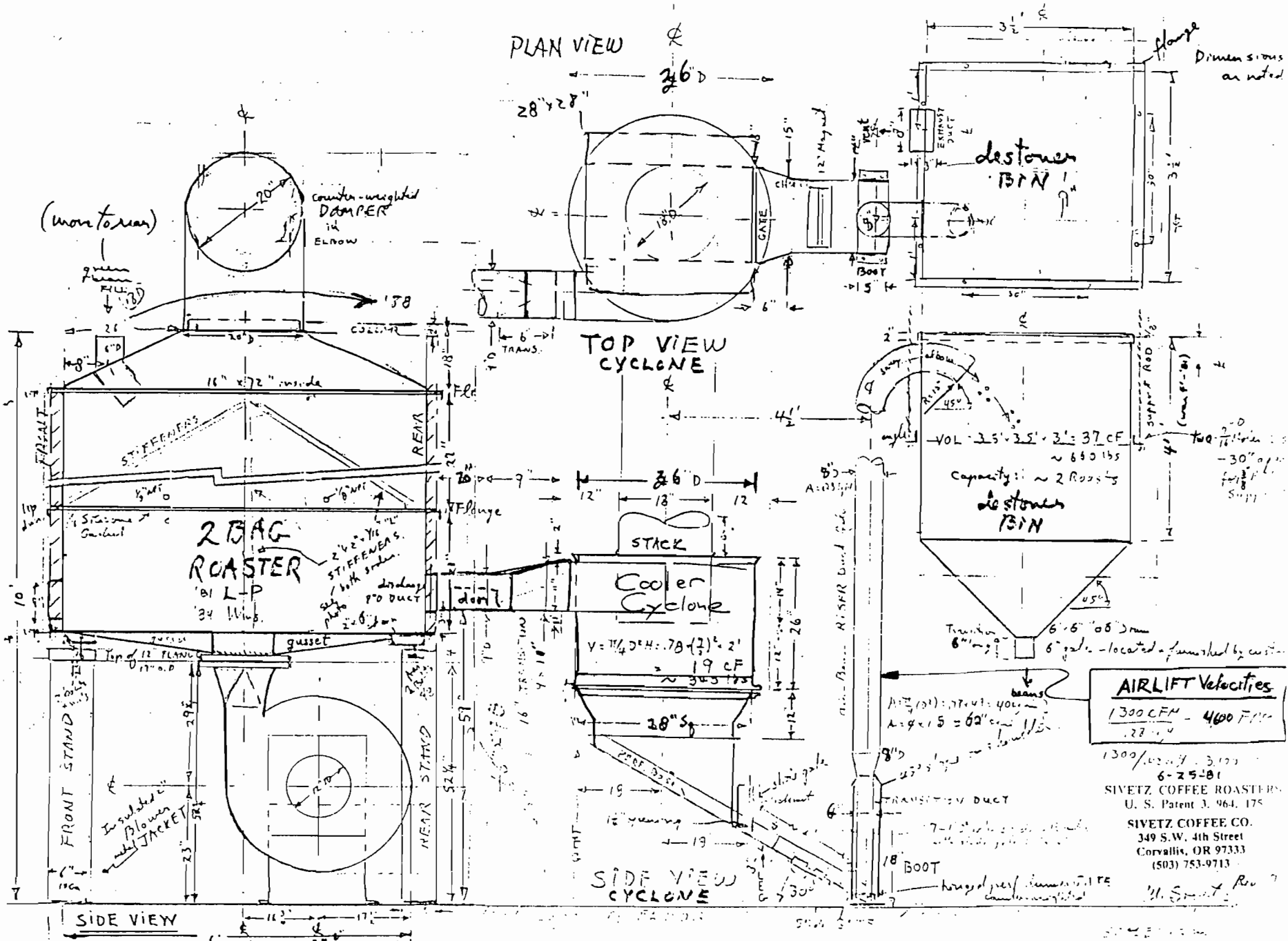
ATTACHMENT 4

Process Diagrams



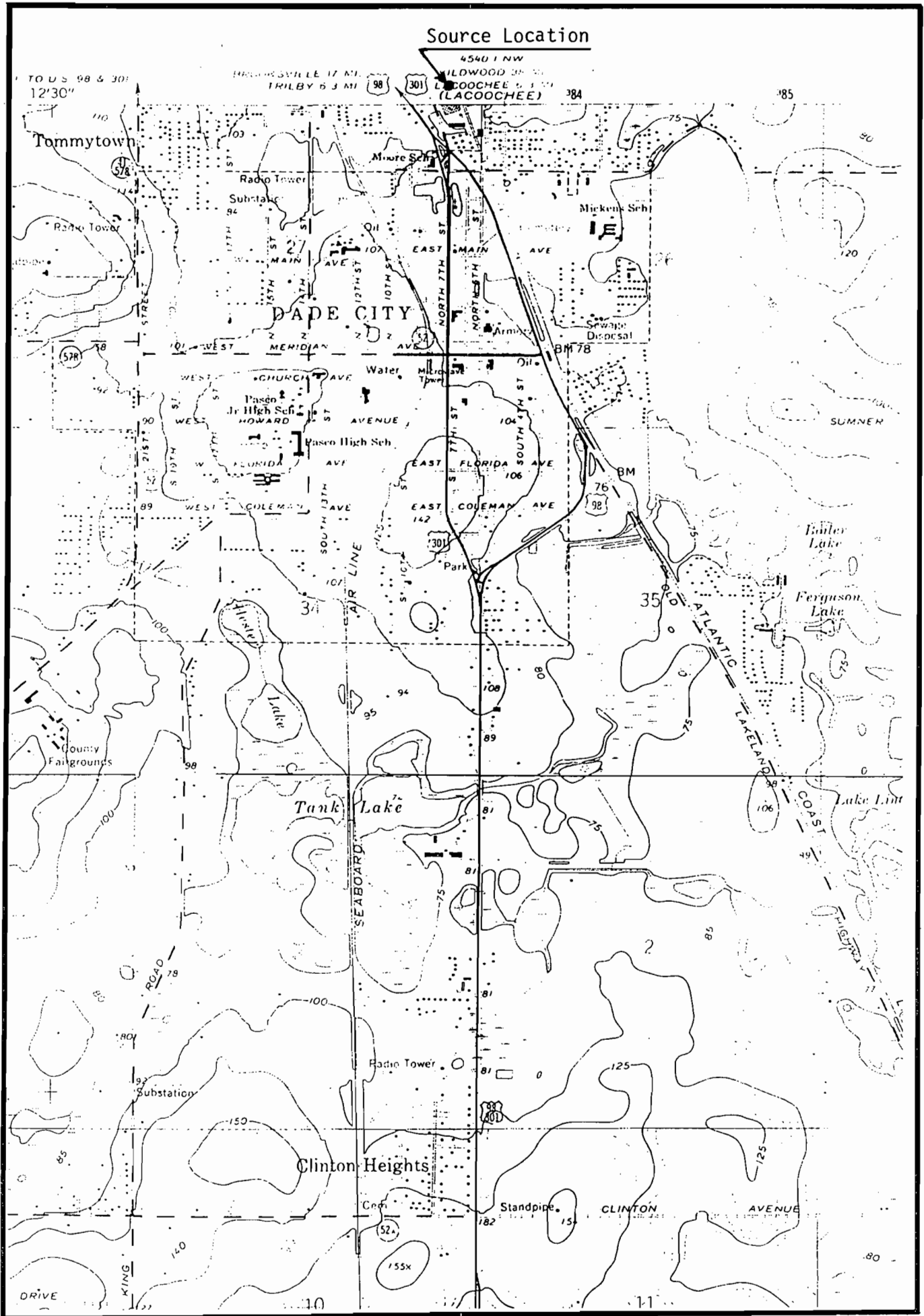


2 BAG ROASTER → ROAST BEAN CYCLE LIFT-COOLER & de-STONER
OVERHEAD ROAST BEAN BIN



ATTACHMENT 5

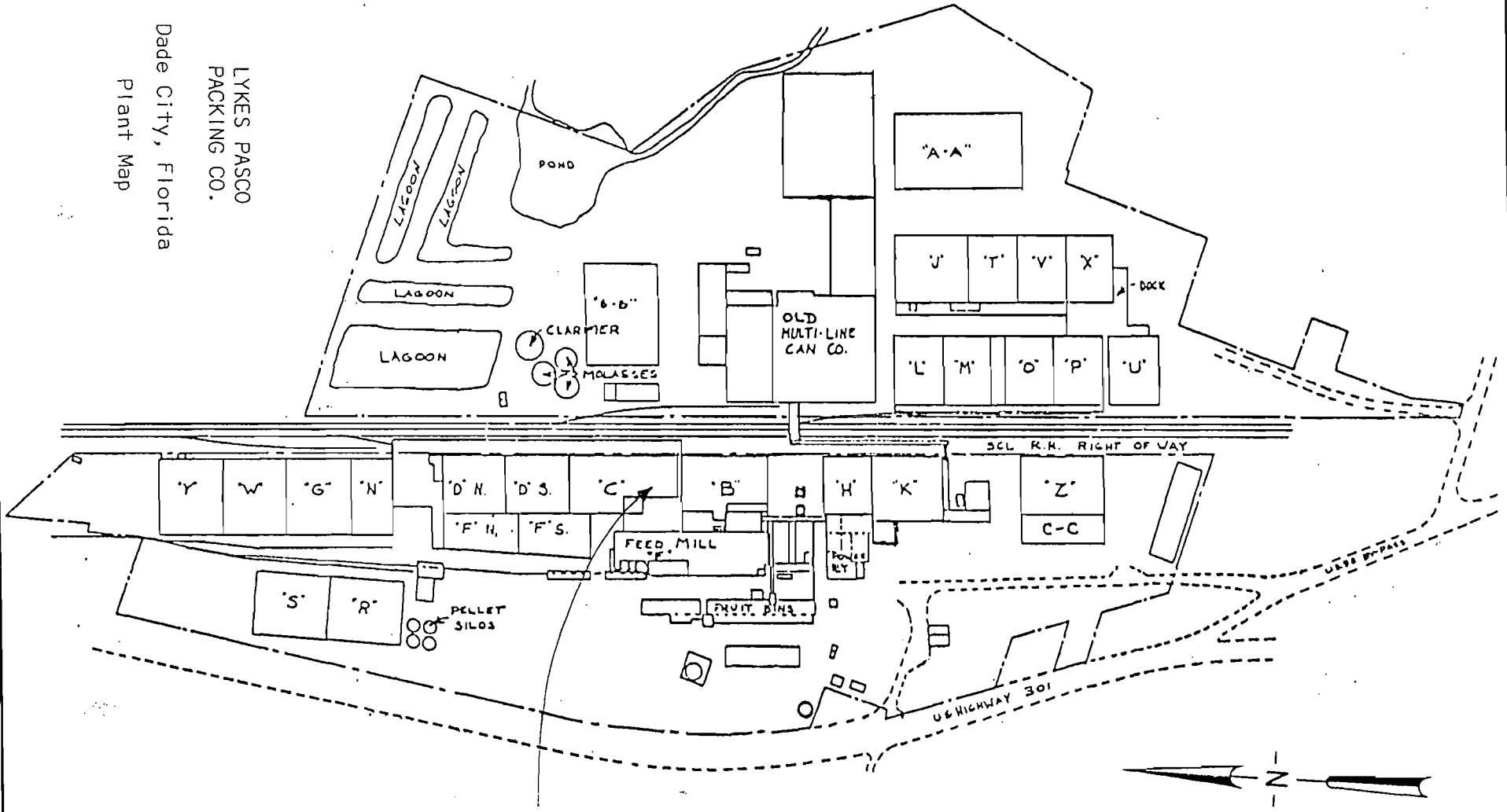
Location Map



ATTACHMENT 6

Site Map

Dade City, Florida
LYKES PASCO
PACKING CO.
Plant Map

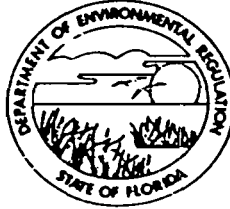


Coffee Line Location

ATTACHMENT 7

Permit for Existing Coffee Line

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION



SOUTHWEST DISTRICT

4520 OAK FAIR BLVD.
TAMPA, FLORIDA 33610-9544

813-623-5561
SunCom—552-7612

BOB MARTINEZ
GOVERNOR

DALE TWACHTMANN
SECRETARY

DR. RICHARD D. GARRITY
DEPUTY ASSISTANT SECRETARY

PERMITTEE:
Mr. N. W. Hunt
Vice President - Technical
Services
Lykes Pasco, Inc.
Post Office Box 97
Dade City, FL 33525

PERMIT/CERTIFICATION
Permit No.: A051-149866
County: Pasco
Expiration Date: 08/25/93
Project: Coffee Roaster, Bean
Cooler and Coffee Extractor

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rules 17-2 & 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the department and made a part hereof and specifically described as follows:

For the operation of a 300 pound batch coffee roaster (2.5 batches/hour) fired by natural gas, a bean cooler and a coffee extractor. Emissions from the roaster are vented through a Chaff Collection cyclone; bean cooler is vented through a Roasted Bean discharge cyclone and coffee extractor vented through Spent Grounds Blowdown cyclone.

Potential / Allowable : 24 hrs/day, 7 days/wh, 52 wks/yr
∴, 8760 hrs/yr

750 lbs/hr green beans
640 lbs/hr product beans

Location: U.S. Highway 301 North, Dade City

Actual '87: 15 hrs/day, 5 days/wh, 48 wks/yr
(ADR) ∴, 3600 hrs '87

UTM: 17-385.5E 3139.2N NEDS NO: 0002 Point ID: 26
32 and 33

Replaces Permit No.: A051-71244 issued: 9/27/83 - 9/10/83

Construction Permit #: AC51-62408 issued: 4/21/83 - 9/25/83

DER Form 17-1.201(5) Page 1 of 3.

PERMITTEE:
Lykes Pasco, Inc.

PERMIT NO: A051-149866
PROJECT: Coffee Roaster, Bean
Cooler and Coffee Extractor

SPECIFIC CONDITIONS:

1. A part of this permit is the attached 15 General Conditions.

2. Particulate emissions from the coffee roaster, bean cooler and coffee extractor shall not exceed 1.95 lbs./hour based on the process input rate of 0.375 tons/hour, pursuant to Subsection 17-2.610(1)(b), F.A.C. At lesser process rates, the allowable emission rates can be determined from the appropriate equation.

3. Visible emissions from the coffee roaster, bean cooler and coffee extractor shall not be equal to or greater than 20% opacity in accordance with Subsection 17-2.610(2)(a), F.A.C.

4. Test the emissions from the coffee roaster, bean cooler and coffee extractor for the following pollutant(s) at intervals of 12 months from the date of July 19, 1988 and submit a copy of test data to the Air section of the Southwest District of the Department of Environmental Regulation within 45 days of such testing, Subsection 17-2.700(2), Florida Administrative Code (F.A.C.).

- (X) Particulates
- (X) Opacity

5. Compliance with the emission limitations of Specific Conditions No. 2 and 3 shall be determined using EPA Methods 1, 2, 4, 5, and 9 contained in 40 CFR 60, Appendix A and adopted by reference in Section 17-2.700, F.A.C. The minimum requirements for stack sampling facilities, source sampling and reporting, shall be in accordance with Section 17-2.700, F.A.C. and 40 CFR 60, Appendix A.

6. The maximum allowable emission rate for particulate matter for the coffee roaster, bean cooler, and coffee extractor is set by the Process Weight Table contained in Subsection 17-2.610(1), F.A.C. Because of the expense and complexity of conducting a stack test on minor sources of particulate matter, the Department pursuant to the authority granted under Subsection 17-2.610(2)(a)(3), F.A.C. hereby waives the requirement for a stack test. The alternative standard set forth by this provision establishes a visible emission limitation not to exceed an opacity of 5% as an indication of compliance.

7. No objectionable odors will be allowed, as per Subsection 17-2.620(2), F.A.C.

PERMITTEE:
Lykes Pasco, Inc.

PERMIT NO: A051-149866
PROJECT: Coffee Roaster, Bean
Cooler and Coffee Extractor

8. All reasonable precautions shall be taken to prevent and control generation of unconfined emissions of particulate matter in accordance with the provision in Subsection 17-2.610 (3), F.A.C.. These provisions are applicable to any source, including, but not limited to, vehicular movement, transportation of materials, construction, alteration, demolition or wrecking, or industrial related activities such as loading, unloading, storing and handling.

9. Should the Department have reason to believe the particulate emission standard is not being met from the coffee roaster, bean cooler and coffee extractor, the Department may require that compliance with the particulate emission standards be demonstrated by testing in accordance with Section 17-2.700, F.A.C.

10. Testing of emissions must be accomplished at approximately the rates as stated in the application. Failure to submit the input rates while conducting the V.E. test or operation at conditions which do not reflect actual operating conditions may invalidate the data (Subsection 403.161(1)(c), F.S.).

11. The Southwest District Office of the Department of Environmental Regulation shall be notified in writing 15 days prior to compliance testing.

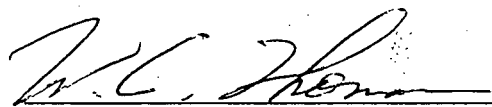
12. Submit for this source, each calendar year, on or before March 1, an emission report for the preceding calendar year containing the following information as per Section 17-4.14, F.A.C.

- (A) Annual amount of materials and/or fuels utilized.
- (B) Annual emissions (note calculation basis).
- (C) Any changes in the information contained in the permit application.

13. An application to renew this operating permit shall be submitted to the Department sixty (60) days prior to the expiration date of this permit.

Issued this 29 day of August
19 88

STATE OF FLORIDA DEPARTMENT OF
ENVIRONMENTAL REGULATION


For Richard D. Garrity, Ph.D.
Deputy Assistant Secretary