

Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

January 8, 2001

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Richard Coyle
Director of Operations
Tropicana Products, Inc.
6500 Glades Cutoff Road
Ft. Pierce, Florida 34981

Re: DEP File No. 1110004-003-AC, PSD-FL-303
Addition of 16 Juice Extractors

Dear Mr. Coyle:

Enclosed is one copy of the draft air construction permit for the existing Tropicana Products, Inc. citrus processing facility located at 6500 Glades Cutoff Road, Ft. Pierce, St. Lucie County. The Technical Evaluation and Determination, the Department's Intent to Issue Air Construction Permit and the Public Notice of Intent to Issue Air Construction Permit are also included.

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

Please submit any written comments you wish to have considered concerning the Department's proposed action to A. A. Linero, P.E., Administrator, New Source Review Section at the above letterhead address. If you have any other questions, please contact Joseph Kahn, P.E., at 850/921-9519 or Mr. Linero at 850/488-0114.

Sincerely,

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

CHF/jk

Enclosures

<p>■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</p> <p>■ Print your name and address on the reverse so that we can return the card to you.</p> <p>■ Attach this card to the back of the mailpiece, or on the front if space permits.</p>		<p>A. Received by (Please Print Clearly) _____ B. Date of Delivery _____</p>	
<p>1. Article Addressed to:</p> <p>Mr. Richard Coyle Director of Operations Tropicana Products, Inc. 6500 Glades Cutoff Road Fort Pierce, FL 34981</p>		<p>C. Signature X <i>Richard Coyle</i> <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p>	
<p>2. Article Number (Copy from service label) 7099 3400 0000 1453 2832</p>		<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If YES, enter delivery address below: _____</p>	
		<p>3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p>	
		<p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>	

PS Form 3811, July 1999

Domestic Return Receipt

102595-99-M-1789

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

7099 3400 0000 1453 2832

Article Sent To:
 Mr. Richard Coyle

Postage	\$	Postmark
Certification Fee		
Return Receipt Fee (Endorsement Returned)		
Restricted Delivery Fee (Endorsement Returned)		
Total Postage & Fees	\$	

Name (Please Print Clearly) (to be completed by mailer)
 Richard Coyle
 Street, Apt. No. or PO box No.
 6500 Glades Cutoff Road
 City, State ZIP+4
 Ft. Pierce, FL 34981

PS Form 3800, July 1999. See Reverse for Instructions

In the Matter of an
Application for Permit by:

Mr. Richard Coyle, Director of Operations
Tropicana Products, Inc.
6500 Glades Cutoff Road
Ft. Pierce, Florida 34981

DEP File No. 1110004-003-AC, PSD-FL-303
Addition of 16 Juice Extractors
St. Lucie County

INTENT TO ISSUE AIR CONSTRUCTION PERMIT

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

The applicant, Tropicana Products, Inc., applied on October 9, 2000, to the Department for an air construction permit to install sixteen additional juice extractors at the existing facility located at 6500 Glades Cutoff Road, Ft. Pierce, St. Lucie County.

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

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

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

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

The Department will accept written comments and requests for public meetings concerning the proposed permit issuance action for a period of thirty (30) days from the date of publication of Public Notice of Intent to Issue Air Permit. Written comments and requests for public meetings should be provided to the Department's Bureau of Air Regulation at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, FL 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in the proposed agency action, the Department shall revise the proposed permit and require, if applicable, another Public Notice.

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

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

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

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

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

Mediation is not available in this proceeding.

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


The application for a variance or waiver is made by filing a petition with the Office of General Counsel of the Department, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. The petition

must specify the following information: (a) The name, address, and telephone number of the petitioner; (b) The name, address, and telephone number of the attorney or qualified representative of the petitioner, if any; (c) Each rule or portion of a rule from which a variance or waiver is requested; (d) The citation to the statute underlying (implemented by) the rule identified in (c) above; (e) The type of action requested; (f) The specific facts that would justify a variance or waiver for the petitioner; (g) The reason why the variance or waiver would serve the purposes of the underlying statute (implemented by the rule); and (h) A statement whether the variance or waiver is permanent or temporary and, if temporary, a statement of the dates showing the duration of the variance or waiver requested.

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

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

Executed in Tallahassee, Florida.


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


CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Intent to Issue Air Construction Permit (including the Public Notice of Intent to Issue Air Construction Permit, Technical Evaluation and Determination, and the draft permit) was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 1/8/01 to the person(s) listed:

Mr. Richard Coyle, Tropicana Products, Inc.*
Mr. Ken Kosky, P.E., Golder
Mr. Isidore Goldman, DEP Southeast District
Mr. Gregg Worley, EPA
Mr. John Bunyak, NPS

Clerk Stamp

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


(Clerk) 1/8/01
(Date)

PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

DEP File No. 1110004-003-AC, PSD-FL-303

Tropicana Products, Inc.
Addition of 16 Juice Extractors
St. Lucie County

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit to Tropicana Products, Inc., to install sixteen additional juice extractors at the existing facility located at 6500 Glades Cutoff Road, Ft. Pierce, St. Lucie County. The applicant's mailing address is: 6500 Glades Cutoff Road, Ft. Pierce, Florida 34981. A Best Available Control Technology (BACT) determination was not required for this project pursuant to Rule 62-212.400, F.A.C. The permit limits potential emissions of air pollutants by limiting fruit throughput and operation of certain existing emissions units at the facility.

An air quality impact analysis was conducted. Emissions from the facility will not significantly contribute to or cause a violation of any state or federal ambient air quality standards. The maximum predicted PSD Class II increments of PM₁₀, SO₂, and NO₂ consumed by all sources in the area, including this project, will be as follows:

<u>PSD Class II Increment Consumed (ug/m³)</u>	<u>Allowable Increment (ug/m³)</u>	<u>Percent Increment Consumed</u>
PM₁₀		
24-hour 18	31	58
Annual 5	17	29
SO₂		
3-hour 207	512	40
24-hour 70	91	77
Annual 9	20	45
NO₂		
Annual 3	25	12

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

The Department will accept written comments and requests for public meetings concerning the proposed permit issuance action for a period of thirty (30) days from the date of publication of this Public Notice of Intent to Issue Air Construction Permit. Written comments and requests for public meetings should be provided to the Department's Bureau of Air Regulation at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, FL 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in the proposed agency action, the Department shall revise the proposed permit and require, if applicable, another Public Notice.

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

Mediation is not available in this proceeding.

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

NOTICE TO BE PUBLISHED IN THE NEWSPAPER

Florida Statutes must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. Under section 120.60(3), however, any person who asked the Department for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under sections 120.569 and 120.57 F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205 of the Florida Administrative Code.

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

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

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

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

Dept. of Environmental Protection	Dept. of Environmental Protection
Bureau of Air Regulation	Southeast Florida District
Suite 4, 111 S. Magnolia Drive	400 North Congress Avenue
Tallahassee, Florida, 32301	West Palm Beach, Florida 33401
Telephone: 850/488-0114	Telephone: 561/681-6600
Fax: 850/922-6979	

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

NOTICE TO BE PUBLISHED IN THE NEWSPAPER

1 APPLICANT NAME AND ADDRESS

Tropicana Products, Inc.
6500 Glades Cutoff Road
Ft. Pierce, Florida 34981

Authorized Representative: Richard Coyle, Director of Operations, Ft. Pierce Facility

2 PROJECT

The project is the installation of sixteen additional citrus juice extractors at its existing citrus processing facility, raising the total number of extractors to sixty-six, and raising the annual processing capacity of the facility to 38.25 million boxes of citrus fruit per year (based on 90 pounds of oranges or 85 pounds of grapefruit per box). The project description, emissions and rule applicability are described in detail in Section I of the permit.

3 SOURCE IMPACT ANALYSIS

As discussed in more detail in Section I of the permit, the annual potential emissions associated with this project are: PM/PM₁₀, 250.2; SO₂, 638.5; NO_x, 223.8; CO, 1693.3; VOC, 10588.3; and sulfuric acid mist, 8.5 tons per year. An impact analysis was required for this project because it is subject to the requirements of PSD for these pollutants.

3.1 AIR QUALITY ANALYSIS INTRODUCTION

The proposed project will increase emissions of six regulated pollutants at levels in excess of PSD significant amounts: PM/PM₁₀, SO₂, NO₂, CO, VOC and sulfuric acid mist. PM₁₀, SO₂ and NO₂ are criteria pollutants and have national and state ambient air quality standards (AAQS), PSD increments, and significant impact levels defined for them. CO is a criteria pollutant and has only AAQS and significant impact levels defined for it. Sulfuric acid mist is a non-criteria pollutant and has no AAQS or PSD increments defined for it; therefore, only a qualitative analysis of the impacts of this pollutant was done. Potential emissions for VOC are above the 40 TPY significance threshold for the pollutant ozone. The applicant presented the potential increases to the Department, but based on the options available to predict potential impacts associated with the emissions and formation of ozone, the Department has determined that the use of regional models which incorporate the complex chemical mechanisms for predicting ozone formation are not feasible for this project.

The applicant's initial Class II PM₁₀, SO₂ and NO₂ analyses revealed significant impacts in the area surrounding the proposed facility; therefore, full impact Class II AAQS and PSD Class II increment analyses were conducted for PM₁₀, SO₂ and NO₂. Because the project's impact for PM₁₀ and SO₂ are greater than the de minimis monitoring concentrations, pre construction monitoring was required for these pollutants.

No impacts on the Everglades National Park were calculated since the project is located 180 km north of this Class I area.

Based on these required analyses, the Department has reasonable assurance that the proposed project, as described in this report and subject to the conditions of approval proposed herein, will not cause or significantly contribute to a violation of any AAQS or PSD increment. However, the following EPA-directed stack height language is included: "In approving this permit, the Department has determined that the application complies with the applicable provisions of the stack height regulations as revised by EPA on July 8, 1985 (50 FR 27892). Portions of the regulations have been remanded by a panel of the U.S. Court of Appeals for the D.C. Circuit in NRDC v. Thomas, 838 F. 2d 1224 (D.C. Cir. 1988).

Consequently, this permit may be subject to modification if and when EPA revises the regulation in response to the court decision. This may result in revised emission limitations or may affect other actions taken by the source owners or operators." A more detailed discussion of the required analyses follows.

3.2 ANALYSIS OF EXISTING AIR QUALITY

Preconstruction ambient air quality monitoring is required for all pollutants subject to PSD review unless otherwise exempted or satisfied. This monitoring requirement may be satisfied by using previously existing representative monitoring data, if available. An exemption to the monitoring requirement shall be granted by rule if either of the following conditions is met: the maximum predicted air quality impact resulting from the projected emissions increase, as determined by air quality modeling, is less than a pollutant-specific de minimis ambient concentration; or the existing ambient concentrations are less than a pollutant-specific de minimis ambient concentration. If preconstruction ambient monitoring is exempted, determination of background concentrations for PSD significant pollutants with established AAQS may still be necessary for use in any required AAQS analysis. These concentrations may be established from the required preconstruction ambient air quality monitoring analysis or from existing representative monitoring data. These background ambient air quality concentrations are added to pollutant impacts predicted by modeling and represent the air quality impacts of sources not included in the modeling. No de minimis ambient concentration is provided for ozone. Instead the net emissions increase of VOC is compared to a de minimis monitoring emission rate of 100 tons per year. The table below shows maximum project air quality impacts for comparison to these de minimis levels.

MAXIMUM PROJECT AIR QUALITY IMPACTS FOR COMPARISON TO THE DE MINIMIS LEVELS				
Pollutant	Averaging Time	Maximum Predicted Impact ($\mu\text{g}/\text{m}^3$)	Impact Greater than De Minimis (Yes/No)	De Minimis Level ($\mu\text{g}/\text{m}^3$)
PM ₁₀	24-hr	42	YES	16
CO	8-hr	364	NO	575
NO ₂	Annual	3	NO	14
SO ₂	24-hour	259	YES	13
VOC	Annual Emission Rate	10,588 TPY	YES	100 TPY

As shown in the table NO₂ and CO emissions are predicted to be less than the de minimis levels; therefore, preconstruction monitoring is not required for these pollutants. However, PM₁₀, SO₂ and VOC impacts from the project are predicted to be greater than the de minimis levels; therefore, the applicant is not exempt from preconstruction monitoring for these pollutants. The applicant may instead satisfy the preconstruction monitoring requirement using previously existing representative data. Previously existing representative monitoring data do exist from PM₁₀ and ozone monitors in the local Fort Pierce area and from an SO₂ monitor in the urbanized Riviera Beach area to the south of the facility. These data are appropriate for fulfilling the monitoring requirement for these pollutants, and to establish background concentrations for use in the PM₁₀ and SO₂ AAQS analyses. In addition data from an NO₂ monitor located in West Palm Beach are used to establish a background concentration for NO₂. The background concentrations for these pollutants are shown in the table below.

BACKGROUND CONCENTRATIONS FOR USE IN AAQS ANALYSES		
Pollutant	Averaging Time	Background Concentration ($\mu\text{g}/\text{m}^3$)
PM ₁₀	Annual	20
	24-hour	39
SO ₂	Annual	5
	24-hour	34
	3-hour	37
NO ₂	Annual	25

3.3 MODELS AND METEOROLOGICAL DATA USED IN THE AIR QUALITY ANALYSIS

The EPA-approved Industrial Source Complex Short-Term (ISCST3) dispersion model was used to evaluate the pollutant emissions from the proposed project and other existing major facilities. The model determines ground-level concentrations of inert gases or small particles emitted into the atmosphere by point, area, and volume sources. The model incorporates elements for plume rise, transport by the mean wind, Gaussian dispersion, and pollutant removal mechanisms such as deposition. The ISCST3 model allows for the separation of sources, building wake downwash, and various other input and output features. A series of specific model features, recommended by the EPA, are referred to as the regulatory options. The applicant used the EPA recommended regulatory options in each modeling scenario. Direction-specific downwash parameters were used for all sources for which downwash was considered. The stacks associated with this project will not exceed the good engineering practice (GEP) stack height criteria.

Meteorological data used in the ISCST3 model consisted of a concurrent 5-year period of hourly surface weather observations and twice-daily upper air soundings from the National Weather Service (NWS) station at West Palm Beach, Florida. The 5-year period of meteorological data was from 1987 through 1991. This NWS station was selected for use in the study because it is the closest primary weather station to the study area and is most representative of the project site. The surface observations included wind direction, wind speed, temperature, cloud cover, and cloud ceiling.

Because five years of data are used in ISCST3, the highest-second-high (HSH) short-term predicted concentrations were compared with the appropriate AAQS or PSD increments. For the annual averages, the highest predicted annual average was compared with the standards. For determining the project's significant impact area in the vicinity of the facility, both the highest short-term predicted concentrations and the highest predicted yearly averages were compared to their respective significant impact levels.

3.4 SIGNIFICANT IMPACT ANALYSIS

Preliminary modeling is performed using only the proposed project's worst-case emission scenario for each pollutant and applicable averaging time. Over 700 receptors were placed along the facility's restricted property line and out to 80 km from the facility, which is located in a PSD Class II area. Modeling refinements were done, as needed, by using a polar receptor grid with a maximum spacing of 100 m along each radial and an angular spacing between radials of one or two degrees. For each pollutant subject to PSD and also subject to PSD increment and/or AAQS analyses, this modeling compares maximum predicted impacts due to the project with PSD significant impact levels to determine whether significant impacts due to the project were predicted in the vicinity of the facility. In the event that the maximum predicted impact of a proposed project is less than the appropriate significant impact level, a full impact analysis for that pollutant is not required. Full impact modeling is modeling that

TECHNICAL EVALUATION AND DETERMINATION

considers not only the impact of the project but also other major sources, including background concentrations, located within the vicinity of the project to determine whether all applicable AAQS or PSD increments are predicted to be met for that pollutant. Consequently, a preliminary modeling analysis, which shows an insignificant impact, is accepted as the required air quality analysis (AAQS and PSD increments) for that pollutant and no further modeling for comparison to the AAQS and PSD increments is required for that pollutant. The table below shows the results of this modeling. The radius of significant impact, if any, for each pollutant and applicable pollutant averaging time is also shown in the tables below.

MAXIMUM PROJECT AIR QUALITY IMPACTS FOR COMPARISON TO THE PSD CLASS II SIGNIFICANT IMPACT LEVELS IN THE VICINITY OF THE FACILITY					
Pollutant	Averaging Time	Maximum Predicted Impact ($\mu\text{g}/\text{m}^3$)	Significant Impact Level ($\mu\text{g}/\text{m}^3$)	Significant Impact? (Yes/No)	Radius of Significant Impact (km)
PM ₁₀	Annual	5	1	YES	9
	24-hr	42	5	YES	9
SO ₂	Annual	8	1	YES	80
	24-hour	259	5	YES	80
	3-hour	659	25	YES	80
CO	8-hr	364	500	NO	---
	1-hr	955	2,000	NO	---
NO ₂	Annual	3	1	YES	3

As shown in the tables the maximum predicted air quality impacts due to PM₁₀, SO₂ and NO₂ emissions from the proposed project are greater than the PSD significant impact levels in the vicinity of the facility. Therefore, the applicant was required to do full impact PM₁₀, SO₂ and NO₂ modeling in the vicinity of the facility, within the applicable significant impact area, to determine the impacts of the project along with all other sources in the vicinity of the facility. The significant impact area is based upon the predicted radius of significant impact.

3.5 FULL IMPACT MODELING

For the full impact PSD Class II increment and AAQS analyses, receptor grids normally are based on the size of the significant impact area for each pollutant. As shown in the previous section, the sizes of the significant impact areas for the required PM₁₀, SO₂ and NO₂ analyses were 9, 80 and 3 km, respectively.

3.5.1 PSD INCREMENT ANALYSIS

The PSD increment represents the amount that sources constructed after the PSD Baseline dates, (February 8, 1988 for NO₂ and January 6, 1975 for PM₁₀ and SO₂), may increase ambient ground level concentrations of a pollutant. Atmospheric dispersion modeling was performed to quantify the amount of PSD increment consumed in the Class II Area surrounding the facility for PM₁₀, SO₂ and NO₂. The results of this analysis are shown in the table below. Maximum PM₁₀, SO₂ and NO₂ concentrations predicted for the proposed project at receptors in the Class II area do not show any impacts greater than the PSD Class II increments for the corresponding averaging periods. Therefore, the proposed project will not contribute to a violation of the Class II increment for PM₁₀, SO₂ and NO₂, and may be permitted by Department rules.

PSD CLASS II INCREMENT ANALYSIS				
Pollutant	Averaging Time	Maximum Predicted Impact ($\mu\text{g}/\text{m}^3$)	Impact Greater than Allowable Increment? (Yes/No)	Allowable Increment ($\mu\text{g}/\text{m}^3$)
PM ₁₀	Annual	5	NO	17
	24-hr	18	NO	31
SO ₂	Annual	9	NO	20
	24-hour	70	NO	91
	3-hour	207	NO	512
NO ₂	Annual	3	NO	25

3.5.2 AAQS ANALYSIS

The AAQS represents the maximum concentration of a pollutant that ambient air may contain. Atmospheric dispersion modeling, as previously described, was performed to quantify the amount of PM₁₀, SO₂ and NO₂ in the ambient air surrounding the facility. To make the modeling conservative, the maximum predicted impact was added to a background concentration that was observed at a local air monitor. This background concentration accounts for sources of a particular pollutant that are not explicitly modeled. The results of these analyses are shown in the table below. Maximum PM₁₀, SO₂ and NO₂ concentrations predicted for the proposed project did not show any impacts greater than the AAQS for all corresponding averaging periods. Therefore, the proposed project will not contribute to a violation of the AAQS for PM₁₀, SO₂ and NO₂, and may be permitted by Department rules.

AMBIENT AIR QUALITY IMPACTS						
Pollutant	Averaging Time	Major Sources Impact ($\mu\text{g}/\text{m}^3$)	Background Concentration ($\mu\text{g}/\text{m}^3$)	Total Impact ($\mu\text{g}/\text{m}^3$)	Total Impact Greater than AAQS?	Florida AAQS ($\mu\text{g}/\text{m}^3$)
PM ₁₀	Annual	16	20	36	NO	50
	24-hr	102	39	141	NO	150
SO ₂	Annual	34	5	39	NO	60
	24-hr	224	34	258	NO	260
	3-hr	580	37	617	NO	1300
NO ₂	Annual	5	25	30	NO	100

3.6 ADDITIONAL IMPACTS-IMPACTS ON SOIL, VEGETATION, WILDLIFE, VISIBILITY AND GROWTH

The maximum ground-level concentrations predicted to occur for all regulated pollutants, as a result of the proposed project, including background concentrations and all other nearby sources, will be less than the respective ambient air quality standard (AAQS). The project impacts are less than the AAQS for all regulated pollutants, and less than the applicable allowable increments for all regulated pollutants. Because the AAQS are designed to protect both the public health and welfare, it is reasonable to assume the impacts on soils, vegetation, and wildlife will be minimal or insignificant. There will be little no growth associated with this project.

4 BACT DETERMINATION REQUESTED BY THE APPLICANT

The applicant proposed that BACT does not apply to this project because the process components (sixteen juice extractors) undergoing physical change (installation) have little associated emissions. The applicant did not request the relaxation of any current federally enforceable production or process limits on the existing emissions units, so the applicant did not propose BACT. The applicant acknowledges that the other existing emissions units—steam boilers, peel dryer and pellet coolers—may experience an increase in actual hours of operation or production rates as a result of this project, but previous permits either imposed no limit on these parameters or the existing permitted capacities are sufficient to accommodate the change. The applicant proposed that because these emissions units will not be modified (undergo a physical change or change in the method of operation as defined by federal rules), BACT will not apply to these units. The also applicant cited state rules and precedent to support this conclusion. The applicant proposed limits on fuel oil usage and sulfur content for the two existing peel dryers and process steam boilers 1 and 2, and proposed to limit particulate emissions from the common baghouse serving the two existing citrus peel coolers (pellet coolers), to limit emissions to those assumed for impact modeling. The hours of operation of the peel dryers were assumed to be limited in the modeling analyses conducted for the application.

5 BACT ANALYSIS AND DEPARTMENT'S DETERMINATION - JUICE EXTRACTORS

The BACT evaluation should be performed for each emissions unit and pollutant under consideration. For this project the PSD pollutants of concern are PM/PM₁₀, SO₂, NO_x, CO, VOC, and sulfuric acid mist (SAM). The project results in a net emissions increase greater than the significant emission rates for PM/PM₁₀, SO₂, NO_x, CO, VOC and SAM because of collateral emissions increases from existing permitted emissions units associated with this project. However, for this project, no emissions unit is being constructed or modified. No BACT determination is required. This is discussed further below.

The process equipment to be installed for this project are sixteen juice extractors. Juice extractors derive citrus juice from washed and graded citrus fruits by mechanically squeezing or reaming the juice out of whole or halved fruits. Other products of this operation are peel oil, pulp, peel, rag and seeds. The juice is further processed by other equipment at the facility to produce pasteurized single-strength juice or frozen concentrated juice. The peel, pulp rag and seeds are further processed by other equipment at the facility into other products and byproducts, including boxed pulp, pulp wash, animal feed and citrus molasses.

The Department considers juice extractors at citrus processing facilities to be process equipment, not emissions units. There is no stack or emission point associated with the juice extraction process, and the process equipment is not designed or intended to emit air pollutants. The juice extraction process and subsequent conveying of its products are enclosed and provide little opportunity for fugitive emissions of the only pollutant potentially emitted, VOC from citrus oil. VOC may escape the process equipment in small amounts that are fugitive in nature and not directly quantifiable; the odor of citrus fruit is typically present in the extractor room of citrus processing facilities, which would indicate the presence of aromatic oils in the air. However, this may also be the result of fruit washing, grading and conveying prior to the fruit entering the extractors. The Department believes the potential emissions of VOCs from the extractors are very low, although there are no data quantifying these emissions. Control of these emissions is already accomplished by the enclosures intrinsic to the juice extractors, and further control is not reasonable. Although this project results in a physical change to the facility by the addition of the sixteen juice extractors, the applicant is not constructing emissions units. The applicant has not requested the relaxation of any current federally enforceable throughput or emission limits. No existing

emissions units are undergoing construction or modification, as defined by Department rule. Since BACT applies only to those emissions units that undergo construction or modification, BACT does not apply to any of the emissions units at the facility for this project.

This permit allows the installation of the juice extractors, but imposes a facility-wide limitation on citrus fruit processing capacity of the facility to limit potential emissions from the facility's existing emissions units. (This permit does not impose a minimum level of citrus oil recovery because the applicant did not rely on a minimum level of oil recovery in estimating emissions.) This permit also imposes specific requirements to limit potential emissions of particulate matter from the two existing citrus feed coolers (pellet coolers) which are controlled by a common baghouse, imposes a limit on hours of operation of the two existing peel dryers, and establishes limits on the sulfur content and usage of residual fuel oil in the two existing peel dryers and two of the process steam boilers, to conform to applicant's requested limits and assumptions used in the impact modeling analyses. This permit does not change any limit imposed by previous permits for the smallest process steam boiler, which is fired exclusively on natural gas.

In addition to the information submitted by the applicant in its application and that information mentioned above, the Department may rely upon other available information in making its BACT determination. For this project, the Department also relied upon its own interpretation of its rules, to which this source is subject. (The Department vigorously does not agree with the applicant's assertion that the Department's ability to review and apply its rules in a case-by-case manner for its new source review program may result in a decision that would constitute "non-rule policy." The Department clearly has the right to evaluate each application consistent with its reading of the rules today, regardless of past actions and interpretations.) Although the Department believes that its rules and not federal rules are the pertinent rules for this review, the Department also reviewed EPA's guidance regarding the application of BACT and debottlenecking. The Department's determination that BACT is not applicable documented above is based on this information and the informed judgement of the Department.

6 MACT DETERMINATION

As discussed in Section I of the permit, although the applicant indicated that the facility is a major source of HAP emissions, this facility is not subject to a case-by-case MACT determination for control of emissions of HAPs. The applicant is not required by the permit application to provide, and did not provide, estimated annual potential emissions of regulated hazardous air pollutants (HAPs).

Rule 62-204.800(10)(d)2, F.A.C., generally requires a MACT review for all major sources of HAPs that are to be constructed or reconstructed. In this case, no source of HAPs is proposed to be constructed or reconstructed, so this project is not subject to a case-by-case MACT determination.

7 EXCESS EMISSIONS AND COMPLIANCE REQUIREMENTS

Excess emissions are not changed or limited by this permit except for the pellet coolers, emissions units 007, which are allowed no permitted excess emissions for startup and shutdown.

The permit imposes limitations on process rates and emissions to limit potential emissions to those levels described in the permit upon which impact analyses were conducted. Specific requirements and compliance methods are detailed in Sections II and III of the permit.

8 PRELIMINARY DETERMINATION

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

determination is to issue the draft permit to allow installation of sixteen additional juice extractors, subject to the terms and conditions of the draft permit.

9 FINAL DETERMINATION

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

DETAILS OF THIS ANALYSIS MAY BE OBTAINED BY CONTACTING:

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

PERMITTEE

Tropicana Products, Inc.
6500 Glades Cutoff Road
Ft. Pierce, Florida 34981

Permit No.	1110004-003-AC, PSD-FL-303
Project	Addition of 16 Juice Extractors
SIC No.	2037
Expires:	^DRAFT

Authorized Representative:

Richard Coyle, Director of Operations

PROJECT AND LOCATION

This permit authorizes Tropicana Products, Inc. to install sixteen additional citrus juice extractors at its existing citrus processing facility, raising the total number of extractors to sixty-six.

This facility is located at 6500 Glades Cutoff Road, Ft. Pierce, St. Lucie County. The UTM coordinates are: Zone 17; 561.0 km E and 3028.1 km N.

STATEMENT OF BASIS

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

APPENDIX

The attached appendix is a part of this permit:

Appendix GC General Permit Conditions

DRAFT

Howard L. Rhodes, Director
Division of Air Resources
Management

AIR CONSTRUCTION PERMIT
SECTION I. FACILITY INFORMATION

FACILITY DESCRIPTION, PROJECT DETAILS AND RULE APPLICABILITY

This facility consists of an existing citrus processing facility that extracts juice from whole citrus fruit to produce single-strength and frozen concentrated juices and byproducts of juice production such as citrus oils, citrus molasses and animal feed.

The applicant proposed in this project to install sixteen additional juice extractors, bringing the total number of juice extractors at the facility to sixty-six. The extractors will be added in two phases. The first will add five extractors during the 2000-2001 season, and the second will add eleven during the 2001-2002 season. This will raise the annual processing capacity of the facility to 38.25 million boxes of citrus fruit per year (based on 90 pounds of oranges or 85 pounds of grapefruit per box).

The emissions increases associated with this project were estimated by the applicant as follows in tons per year:

Pollutant	Actual Emissions ¹	Potential Emissions ²	Net Increase	PSD Significance	Subject to PSD?
PM/PM ₁₀	33.1	250.2	217.1	25/15	Yes
SO ₂	1.3	638.5	637.2	40	Yes
NOx	43.1	223.8	180.7	40	Yes
CO	871.8	1,693.3	821.5	100	Yes
VOC	4,887.0	10,588.3	5,701.3	40	Yes
SAM	Negligible	8.5	8.5	7	Yes

² Potential emissions were estimated by the applicant. From Tables 2-3, 2-4 (corrected), 2-5, 2-7 and 2-8 (corrected).

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

This facility is not within an industry included in the list of the 28 Major Facility Categories per Table 62-212.400-1, F.A.C. Because emissions are greater than 250 TPY for at least one criteria pollutant, the facility is also an existing Major Facility with respect to Rule 62-212.400, Prevention of Significant Deterioration (PSD). The net increase in emissions of PM/PM₁₀, SO₂, sulfuric acid mist (SAM), NOx, CO and VOC exceed the PSD significance levels of Table 212.400-2, F.A.C. Therefore the project is subject to PSD requirements of Rule 62-212.400.F.A.C., for these pollutants. The project results in these net emissions increases because of collateral emissions increases from existing permitted emissions units related to this physical change, rather than emissions from the new juice extractors. The project is not subject to a BACT determination, as discussed in the Department's Technical Evaluation and Determination. Briefly, although this project results in a physical change to the facility by the addition of the sixteen juice extractors, the applicant is not constructing emissions units, and the applicant has not requested relaxation of any current federally enforceable limits.

AIR CONSTRUCTION PERMIT
SECTION I. FACILITY INFORMATION

This permit allows the installation of the juice extractors, but imposes a facility-wide limitation on citrus fruit processing capacity of the facility to limit potential emissions from the facility's existing emissions units. This limit is established in Section II of this permit. This permit also imposes specific requirements to limit potential emissions of particulate matter from the citrus feed coolers, establishes limits on hours of operation for the two peel dryers, and establishes limits on the sulfur content and usage of fuel oil in the two peel dryers and in process steam boilers 1 & 2, to conform to applicant's requested limits and assumptions used in the impact modeling analyses. These limits are established in Section III of this permit.

The applicant stated that this facility is a major source of hazardous air pollutants (HAPs). This project is not subject to a case-by-case MACT determination, per Rule 62-204.800(10)(d)2, F.A.C., because it does not result in the construction or reconstruction of a major source of HAP emissions.

This project does not impose any requirements under the New Source Performance Standards, 40 CFR 60, or National Emissions Standards for Hazardous Air Pollutants, 40 CFR 61 or 63.

REVIEWING AND PROCESS SCHEDULE

October 9, 2000	Received permit application and fee
November 8, 2000	Department's request for additional information
December 6, 2000	Received applicant's response to Department's request
December 6, 2000	Application complete for purposes of the timeclock
^DRAFT	Distributed Notice of Intent to Issue and supporting documents
^DRAFT	Notice of Intent published in ^

RELEVANT DOCUMENTS

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

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

AIR CONSTRUCTION PERMIT

SECTION II. FACILITY-WIDE SPECIFIC CONDITIONS

The following specific conditions apply to all emissions units at this facility addressed by this permit after installation of any or all of the three additional juice extractors. The throughput and oil recovery limitations shall apply to the facility as a whole. The following specific conditions apply to the following emissions unit after installation of any or all of the sixteen additional juice extractors. These conditions shall revise and supplement conditions imposed by previous permitting actions. Except for the conditions of this section, no other conditions of previous permitting actions shall be changed by this permit.

ADMINISTRATIVE

1. Regulating Agencies: All documents related to applications for permits to construct, operate or modify an emissions unit should be submitted to the Bureau of Air Regulation (BAR), Florida Department of Environmental Protection at Mail Station #5505, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, phone number 850/488-0114. All documents related to reports, tests, minor modifications and notifications shall be submitted to the Department's Southeast District office at PO Box 15425, West Palm Beach, Florida 33416-5425, and phone number 561-681-6600.
2. General Conditions: The owner and operator is subject to and shall operate under the attached General Permit Conditions G.1 through G.15 listed in Appendix GC of this permit. General Permit Conditions are binding and enforceable pursuant to Chapter 403 of the Florida Statutes. [Rule 62-4.160, F.A.C.]
3. Terminology: The terms used in this permit have specific meanings as defined in the corresponding chapters of the Florida Administrative Code.
4. Applicable Regulations, Forms and Application Procedures: Unless otherwise indicated in this permit, the construction and operation of the subject emissions unit shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of Chapter 403, F.S. and Florida Administrative Code Chapters 62-4, 62-110, 62-204, 62-212, 62-213, 62-296, 62-297 and the Code of Federal Regulations Title 40, Part 60, adopted by reference in the Florida Administrative Code (F.A.C.) regulations. The permittee shall use the applicable forms listed in Rule 62-210.900, F.A.C. and follow the application procedures in Chapter 62-4, F.A.C. Issuance of this permit does not relieve the facility owner or operator from compliance with any applicable federal, state, or local permitting or regulations. [Rules 62-204.800, 62-210.300 and 62-210.900, F.A.C.]
5. New or Additional Conditions: Pursuant to Rule 62-4.080, F.A.C., for good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]
6. Expiration: This air construction permit shall expire on ^DRAFT. The permittee, for good cause, may request that this construction/PSD permit be extended. Such a request shall be submitted to the Department's Bureau of Air Regulation prior to 60 days before the expiration of the permit. [Rules 62-210.300(1), 62-4.070(4), 62-4.080, and 62-4.210, F.A.C.]

PSD Expiration: Approval to construct shall become invalid if construction is not commenced within 18 months after receipt of such approval, or if construction is discontinued for a period of 18

AIR CONSTRUCTION PERMIT

SECTION II. FACILITY-WIDE SPECIFIC CONDITIONS

months or more, or if construction is not completed within a reasonable time. The Department may extend the 18-month period upon a satisfactory showing that an extension is justified. [Rules 62-4.070(4), 62-4.210(2) & (3), and 62-210.300(1)(a); F.A.C.]

BACT Determination Review: In conjunction with extension of the 18 month periods to commence or continue construction, extension of the permit expiration date, or where construction is conducted in two or more phases, the permittee may be required to demonstrate the adequacy of any previous determination of Best Available Control Technology (BACT) for the source. [Rules 62-4.070(4), 62-4.210(2) & (3), 62-210.300(1)(a), and 62-212.400(6)(b), F.A.C.]

7. Modifications: No emissions unit or facility subject to this permit shall be constructed or modified without obtaining an air construction permit from the Department. Such permit must be obtained prior to the beginning of construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]
8. Title V Operation Permit Revision Required: This permit authorizes construction and/or installation of the permitted emissions unit and initial operation to determine compliance with Department rules. A Title V operation permit revision is required to reflect new limitations on emissions for the citrus feed coolers and limits on fuel oil consumption and sulfur content for peel dryers 1 & 2 and process steam boilers 1 & 2. The owner or operator shall apply for a Title V operation permit at least ninety days prior to expiration of this permit, but no later than 180 days after commencing operation. To apply for a Title V operation permit, the applicant shall submit the appropriate application form, compliance test results, and such additional information as the Department may by law require. The application shall be submitted to the Department's Southeast District office. [Rules 62-4.030, 62-4.050, 62-4.220, and Chapter 62-213, F.A.C.]

EMISSION LIMITING STANDARDS

9. General Visible Emissions Standard: Except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, no person shall cause, let, permit, suffer, or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20% opacity). The test method for visible emissions shall be EPA Method 9, incorporated and adopted by reference in Chapter 62-297, F.A.C. Test procedures shall meet all applicable requirements of Chapter 62-297, F.A.C. [Rule 62-296.320(4)(b)1, F.A.C.]
10. Unconfined Emissions of Particulate Matter: [Rule 62-296.320(4)(c), F.A.C.]
 - (a) No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any activity, including vehicular movement; transportation of materials; construction, alteration, demolition or wrecking; or industrially related activities such as loading, unloading, storing or handling; without taking reasonable precautions to prevent such emissions.
 - (b) Any permit issued to a facility with emissions of unconfined particulate matter shall specify the reasonable precautions to be taken by that facility to control the emissions of unconfined particulate matter.
 - (c) Reasonable precautions for this facility include the following:
 - Paving and maintenance of roads, parking areas and yards.

AIR CONSTRUCTION PERMIT

SECTION II. FACILITY-WIDE SPECIFIC CONDITIONS

- Removal of particulate matter from roads and other paved areas under the control of the owner or operator of the facility to prevent reentrainment, and from buildings or work areas to prevent particulate from becoming airborne.
- Landscaping or planting of vegetation.
- Limiting access to plant property by unnecessary vehicles.

(d) In determining what constitutes reasonable precautions for a particular source, the Department shall consider the cost of the control technique or work practice, the environmental impacts of the technique or practice, and the degree of reduction of emissions expected from a particular technique or practice.

11. General Pollutant Emission Limiting Standards: [Rule 62-296.320(1)(a)&(2), F.A.C.]

- (a) No person shall store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department.
- (b) No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor.

[Note: An objectionable odor is defined in Rule 62-210.200(198), F.A.C., as any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance.]

OPERATIONAL REQUIREMENTS

12. Plant Operation - Problems: If temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by hazard of fire, wind or by other cause, the permittee shall immediately notify the Department's Southeast District office. The notification shall include pertinent information as to the cause of the problem, and what steps are being taken to correct the problem and to prevent its recurrence, and where applicable, the owner's intent toward reconstruction of destroyed facilities. Such notification does not release the permittee from any liability for failure to comply with Department rules. [Rule 62-4.130, F.A.C.]
13. Circumvention: No person shall circumvent any air pollution control device or allow the emission of air pollutants without the applicable air pollution control device operating properly. [Rule 62-210.650, F.A.C.]
14. Excess Emissions: Except for the citrus feed coolers, emissions unit 007, this permit does not change any authorization for excess emissions provided by other Department permits. This permit specifically limits periods of excess emissions for the citrus feed coolers. Excess emissions are not permitted by this permit for the citrus feed coolers, emissions unit 007, for any duration for startup and shutdown. [Rule 62-210.700(5), F.A.C.]

COMPLIANCE MONITORING AND TESTING REQUIREMENTS

15. Required Number of Test Runs: For mass emission limitations, a compliance test shall consist of three complete and separate determinations of the total air pollutant emission rate through the test section of the stack or duct and three complete and separate determinations of any applicable process variables corresponding to the three distinct time periods during which the stack emission rate was

AIR CONSTRUCTION PERMIT

SECTION II. FACILITY-WIDE SPECIFIC CONDITIONS

measured; provided, however, that three complete and separate determinations shall not be required if the process variables are not subject to variation during a compliance test, or if three determinations are not necessary in order to calculate the unit's emission rate. The three required test runs shall be completed within one consecutive five-day period. In the event that a sample is lost or one of the three runs must be discontinued because of circumstances beyond the control of the owner or operator, and a valid third run cannot be obtained within the five-day period allowed for the test, the Secretary or his or her designee may accept the results of two complete runs as proof of compliance, provided that the arithmetic mean of the two complete runs is at least 20% below the allowable emission limiting standard. [Rule 62-297.310(1), F.A.C.]

16. Operating Rate During Testing: Unless otherwise stated in the applicable emission limiting standard rule, testing of emissions shall be conducted with the emissions unit operation at permitted capacity. Permitted capacity is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impractical to test at permitted capacity, an emissions unit may be tested at less than the minimum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test load until a new test is conducted. Once the unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity. [Rule 62-297.310(2), F.A.C.]
17. Calculation of Emission Rate: The indicated emission rate or concentration shall be the arithmetic average of the emission rate or concentration determined by each of the three separate test runs unless otherwise specified in a particular test method or applicable rule. [Rule 62-297.310(3), F.A.C.]
18. Test Procedures shall meet all applicable requirements of Rule 62-297.310(4), F.A.C. [Rule 62-297.310(4), F.A.C.]
19. Determination of Process Variables: [Rule 62-297.310(5), F.A.C.]
 - (a) Required Equipment. The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.
 - (b) Accuracy of Equipment. Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.
20. Required Stack Sampling Facilities: Sampling facilities include sampling ports, work platforms, access to work platforms, electrical power, and sampling equipment support. All stack sampling facilities must meet any Occupational Safety and Health Administration (OSHA) Safety and Health Standards described in 29 CFR Part 1910, Subparts D and E. Sampling facilities shall also conform to the requirements of Rule 62-297.310(6), F.A.C. [Rule 62-297.310(6), F.A.C.]
21. Test Notification: The owner or operator shall notify the Department's Southeast District office at least 15 days prior to the date on which each formal compliance test is to begin. Notification shall include the date, time, and place of each such test, and the test contact person who will be

AIR CONSTRUCTION PERMIT

SECTION II. FACILITY-WIDE SPECIFIC CONDITIONS

responsible for coordinating and having such test conducted for the owner or operator. [Rule 62-297.310(7)(a)9., F.A.C.]

22. Special Compliance Tests: When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it shall require the owner or operator of the facility to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions units and to provide a report on the results of said tests to the Department. [Rule 62-297.310(7)(b), F.A.C.]

REPORTING AND RECORD KEEPING REQUIREMENTS

23. Duration of Record Keeping: Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least five years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule. [Rules 62-4.160(14)(a)&(b) and 62-213.440(1)(b)2.b., F.A.C.]
24. Test Reports: The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Department on the results of each such test. The required test report shall be filed with the Department as soon as practical but no later than 45 days after the last sampling run of each test is completed. The test report shall provide sufficient detail on the emissions unit tested and the test procedures used to allow the Department to determine if the test was properly conducted and the test results properly computed. As a minimum, the test report, other than for an EPA or DEP Method 9 test, shall provide the applicable information listed in Rule 62-297.310(8)(c), F.A.C. [Rule 62-297.310(8), F.A.C.]
25. Excess Emissions Report: In case of excess emissions resulting from malfunction, the owner or operator shall notify the Department within one working day of: the nature, extent, and duration of the excess emissions; the cause of the excess emissions; and the actions taken to correct the problem. In addition, the Department may request a written summary report of the incident. A full written report on the malfunctions shall be submitted in a quarterly report if requested by the Department. [Rules 62-4.130 and 62-210.700(6), F.A.C.]
26. Annual Operating Report for Air Pollutant Emitting Facility: The Annual Operating Report for Air Pollutant Emitting Facility shall be completed each year and shall be submitted to the Department's Southeast District office by March 1 of the following year. [Rule 62-210.370(3), F.A.C.]
27. Fruit Throughput Limited: The owner or operator shall not process more than 38.25 million boxes of citrus fruit in any consecutive 12 month period. For purposes of this permit, a box of citrus fruit shall be defined to contain 90 pounds of oranges or 85 pounds of grapefruit. The owner or operator shall make and maintain monthly and rolling 12 month records of fruit processing rates to demonstrate

AIR CONSTRUCTION PERMIT

SECTION II. FACILITY-WIDE SPECIFIC CONDITIONS

compliance with this limitation. Such records shall be made from daily processing records and shall be completed no later than the 10th day of each following month. Any wet peel received from offsite sources for drying, expressed as the equivalent boxes of fruit derived from production records of the offsite source, shall be included in the throughput limitation of this specific condition. [Rule 62-4.070(3), F.A.C.]

AIR CONSTRUCTION PERMIT

SECTION III. EMISSIONS UNITS SPECIFIC CONDITIONS

Subsection A. The following specific conditions apply to the following emissions unit after installation of any or all of the sixteen additional juice extractors. These conditions shall revise and supplement conditions imposed by previous permitting actions. Except for the conditions of this subsection, no other conditions of previous permitting actions shall be changed by this permit.

EMISSIONS UNIT NO.	EMISSIONS UNIT DESCRIPTION
007	Citrus feed coolers. Two pellet coolers vented through a common baghouse

[Note: This emissions unit is subject to the requirements of the state rules as indicated in this permit.]

OPERATIONAL REQUIREMENTS

1. Hours of Operation: This emissions unit shall operate no more than 6120 hours during any consecutive 12 month period. [Rules 62-4.070(3), 62-210.200 and 62-212.400, F.A.C., limitation on potential to emit and assumptions relied upon for modeling impacts]

EMISSION LIMITATIONS AND PERFORMANCE STANDARDS

2. Particulate Emissions Limited: Emissions of particulate matter (PM/PM₁₀) from the common baghouse exhaust serving the two citrus feed coolers (pellet coolers) shall not exceed 10.0 pounds per hour. Annual compliance testing for particulate matter emissions from this emissions unit is waived, and an alternative standard of 5% opacity is imposed, pursuant to Rule 62-297.620(4), F.A.C. If the Department has reason to believe that the particulate weight emission standard is not being met, it shall require that compliance be demonstrated using EPA Method 5, as described in 40 CFR 60 Appendix A.

[Note: These emission limits effectively limit annual emissions of PM/PM₁₀ from this emissions unit to 30.6 tons per year. PM₁₀ emissions are assumed to equal PM emissions.]

[Rules 62-4.070(3) and 62-212.400, F.A.C., limitation on potential to emit and assumptions relied upon for modeling impacts]

COMPLIANCE MONITORING AND TESTING REQUIREMENTS

3. Emission Tests Required: The owner or operator shall demonstrate compliance with the visible emissions limit of this section annually using EPA Method 9, as described in 40 CFR 60, Appendix A. The owner or operator shall demonstrate compliance with the particulate emissions limit of this subsection, as required by this permit, using Method 5 of 40 CFR 60 Appendix A. [Rules 62-4.070(3) and 62-297.310, F.A.C.]

REPORTING AND RECORD KEEPING REQUIREMENTS

4. Records of Operation Required: The owner or operator shall make and maintain records of hours of operation of each citrus feed cooler in units of hours per month and hours per consecutive 12 month period, to demonstrate compliance with the limit of condition 1 of this subsection. Records shall be made from daily operation records and shall be completed no later than the 10th day of each following month. [Rule 62-4.070(3), F.A.C., required to monitor compliance with the limitation on potential to emit]

AIR CONSTRUCTION PERMIT

SECTION III. EMISSIONS UNITS SPECIFIC CONDITIONS

Subsection B. The following specific conditions apply to the following emissions unit after installation of any or all of the sixteen additional juice extractors. These conditions shall revise and supplement conditions imposed by previous permitting actions. Except for the conditions of this subsection, no other conditions of previous permitting actions shall be changed by this permit.

EMISSIONS UNIT NO.	EMISSIONS UNIT DESCRIPTION
001	Citrus feed mill peel dryer/waste heat evaporator #1
004	Citrus feed mill peel dryer/waste heat evaporator #2
002	Process steam boiler #1
003	Process steam boiler #2

[Note: These emissions units are subject to the requirements of the state rules as indicated in this permit. This permit does not change the particulate emission limit of Rule 62-296.320(4)(a), F.A.C., (process weight table), throughput limits for the peel dryers, or annual compliance testing frequency established by previous permits.]

OPERATIONAL REQUIREMENTS

1. Hours of Operation, Peel Dryers: Emissions units 001 and 004 shall each operate no more than 6120 hours during any consecutive 12 month period. [Rules 62-4.070(3), 62-210.200 and 62-212.400, F.A.C., limitation on potential to emit and assumptions relied upon for modeling impacts]
2. Hours of Operation, Boilers: Emissions units 002 and 003 may operate continuously, i.e., 8,760 hours per year. [Rule 62-210.200, F.A.C., limitation on potential to emit]
3. Fuel Oil Limited, Peel Dryers: Each emissions unit 001 and 004 shall be fired with natural gas, and may be fired with residual fuel oil under the following conditions: The maximum sulfur content shall not exceed 1.5 percent, by weight. Consumption of residual fuel oil for each emissions unit shall not exceed 1,613,000 gallons in any consecutive 12-month period.

[Note: Fuel oil consumption is limited to the equivalent of 2880 hours per year. This condition will limit emissions of SO₂ to 182 tons per year from each emissions unit.]

[Rules 62-4.070(3) and 62-212.400, F.A.C., limitation on potential to emit and assumptions relied upon for modeling impacts]

4. Fuel Oil Limited, Process Steam Boilers: Each emissions unit 002 and 003 shall be fired with natural gas, and may be fired with residual fuel oil under the following conditions: The maximum sulfur content shall not exceed 1.5 percent, by weight. Consumption of residual fuel oil for each emissions unit shall not exceed 1,217,300 gallons in any consecutive 12-month period.

[Note: Fuel oil consumption is limited to the equivalent of 2880 hours per year. This condition will limit emissions of SO₂ to 137.5 tons per year from each emissions unit.]

[Rules 62-4.070(3) and 62-212.400, F.A.C., limitation on potential to emit and assumptions relied upon for modeling impacts]

AIR CONSTRUCTION PERMIT

SECTION III. EMISSIONS UNITS SPECIFIC CONDITIONS

COMPLIANCE MONITORING AND TESTING REQUIREMENTS

5. Fuel Sulfur Content Tests: The owner or operator shall determine the sulfur content of each delivery of residual fuel oil received for these emissions units using ASTM D4057-88, Standard Practice for Manual Sampling of Petroleum and Petroleum Products; and one of the following test methods for sulfur in petroleum products: ASTM D129-91, ASTM D1552-90, ASTM D2622-94, or ASTM D4294-90. A more recent version of these methods may be used. The owner or operator may comply with this requirement by receiving records from the fuel supplier that indicate the sulfur content of the fuel oil delivered complies with the sulfur limits of specific conditions 3 and 4 of this section. [Rules 62-4.070(3) and 62-297.440, F.A.C.]

REPORTING AND RECORD KEEPING REQUIREMENTS

6. Records of Operating Hours Required, Peel Dryers: The owner or operator shall make and maintain records of hours of operation of each peel dryer, emissions units 001 and 004, in units of hours per month and hours per consecutive 12 month period, to demonstrate compliance with the limit of condition 1 of this subsection. Records shall be made from daily operation records and shall be completed no later than the 10th day of each following month. [Rule 62-4.070(3), F.A.C., required to monitor compliance with the limitation on potential to emit]
7. Fuel Sulfur Content Records: The owner or operator shall maintain records of sulfur content of each delivery of residual fuel oil received for these emissions units, made pursuant to the requirements of specific condition 5 of this subsection. [Rule 62-4.070(3), F.A.C., required to monitor compliance with the limitation on potential to emit]
8. Residual Fuel Oil Consumption Records: The owner or operator shall make and maintain daily records of residual fuel oil consumption for these emissions units at the end of each day. Within ten days of the end of each month, the owner or operator shall make records of monthly diesel fuel consumption from the daily records, and shall make records of the consecutive 12-month diesel fuel consumption to demonstrate compliance with the fuel consumption limits of specific conditions 3 and 4 of this subsection. [Rule 62-4.070(3), F.A.C., required to monitor compliance with the limitation on potential to emit]
9. Records of Operation of Dryer Bypass Stack Required: The owner or operator shall make records of the number of hours each day that the dryer is operated with emissions directed in total or in part through the bypass stack. The number of hours of bypass stack operation recorded each calendar quarter shall be reported to the Southeast District office no later than the 10th day following each calendar quarter. [Rule 62-4.070(3), F.A.C.]

[Note: Excess emissions are limited by Rule 62-210.700, F.A.C., and previous Department permits. Those limitations are not changed by this permit.]

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

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

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

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

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



Department of Environmental Protection

Jeb Bush
Governor

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

David B. Struhs
Secretary

P.E. Certification Statement

Tropicana Products, Inc., Ft. Pierce Plant
Addition of 16 Juice Extractors

DEP File No.: 1110004-003-AC, PSD-FL-303
Facility ID No.: 1110004

Project: Air Construction/PSD Permit

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

This review was conducted by me and Cleve Holladay for modeling and ambient impact analyses under my responsible supervision.

(Seal)

Joseph Kahn, P.E.
Registration # 45268

1/5/01
Date

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

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

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Florida Department of
Environmental Protection

Memorandum

TO: Clair Fancy
THRU: ~~Al Limero~~ JK
FROM: JK Joe Kahn
DATE: January 5, 2001
SUBJECT: Tropicana Products, Inc.
1110004-003-AC, PSD-FL-303

1/5 PRTY
OK to mail

Attached for approval and signature is the intent to issue for Tropicana Products, Inc.. This project allows the addition of sixteen juice extractors at Tropicana's existing Ft. Pierce facility. To limit the potential emissions of the facility and to conform to the assumptions used in the modeling analyses, the permit imposes limits on fruit throughput, hours of operation for the dryers, particulate emissions from the pellet cooler, and limits on fuel oil consumption and sulfur content in the two dryers and in process steam boilers 1 and 2. No emissions units are undergoing modification for this project. BACT is not applicable to this project. Case-by-case MACT is not applicable to this project.

I have dated the intent letter for Monday, January 8th.

I recommend your approval and signature.

January 5, 2001 is day 30 of the 90 day timeclock.

Attachments

/jk