



**Purpose of Application**

**Air Operation Permit Application**

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

- Initial Title V air operation permit for an existing facility which is classified as a Title V source.
- Initial Title V air operation permit for a facility which, upon start up of one or more newly constructed or modified emissions units addressed in this application, would become classified as a Title V source.  
Current construction permit number: \_\_\_\_\_
- Title V air operation permit revision to address one or more newly constructed or modified emissions units addressed in this application.  
Current construction permit number: \_\_\_\_\_  
Operation permit number to be revised: \_\_\_\_\_
- Title V air operation permit revision or administrative correction to address one or more proposed new or modified emissions units and to be processed concurrently with the air construction permit application. (Also check Air Construction Permit Application below.)  
Operation permit number to be revised/corrected: \_\_\_\_\_
- Title V air operation permit revision for reasons other than construction or modification of an emissions unit. Give reason for the revision; e.g., to comply with a new applicable requirement or to request approval of an "Early Reductions" proposal.  
Operation permit number to be revised: \_\_\_\_\_  
Reason for revision: \_\_\_\_\_

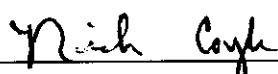
**Air Construction Permit Application**

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

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

**See Application Comment**

**Owner/Authorized Representative or Responsible Official**

1. Name and Title of Owner/Authorized Representative or Responsible Official: <b>Richard Coyle, Director of Operators</b>
2. Owner/Authorized Representative or Responsible Official Mailing Address: Organization/Firm: <b>Tropicana Products, Inc.</b> Street Address: <b>6500 Glades Cutoff Road</b> City: <b>Ft. Pierce</b> State: <b>FL</b> Zip Code: <b>34981</b>
3. Owner/Authorized Representative or Responsible Official Telephone Numbers: Telephone: <b>( 561 ) 465 - 2030</b> Fax: <b>( 561 ) 465 - 2855</b>
4. Owner/Authorized Representative or Responsible Official Statement: <i>I, the undersigned, am the owner or authorized representative*(check here [X], if so) or the responsible official (check here [ ], if so) of the Title V source addressed in this application, whichever is applicable. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof. I understand that a permit, if granted by the Department, cannot be transferred without authorization from the Department, and I will promptly notify the Department upon sale or legal transfer of any permitted emissions unit.</i>   _____ Signature  _____ Date <b>9-11-01</b>

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

**Professional Engineer Certification**

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

DESIGNATION OF DOCUMENT SIGNATORY

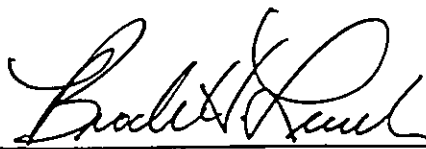
I, Brock H. Leach, hereby certify that I am the President and Chief Executive Officer of Tropicana Products, Inc., ("Tropicana") and as such I am authorized to designate employees to prepare and sign documents and to certify on behalf of said company the accuracy and completeness of information in such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

Pursuant to the power vested in me, I hereby designate the person listed below to prepare and sign documents for submission to federal, state and local government agencies having jurisdiction over environmental, safety and utilities matters, including but not limited to, the United States Environmental Protection Agency, the United States Department of Labor, Occupational Safety and Health, the Florida Department of Environmental Protection, the South Florida Water Management District, and the County of St. Lucie, State of Florida, pertinent to the operation of the Tropicana plant located in Ft. Pierce, Florida.

This designation is effective until revoked in writing.

Designated Signatory

Richard A. Coyle  
Director, Ft. Pierce Operations  
6500 Glades Cut-Off Road  
Ft. Pierce, FL 34981

*MLL*  


Brock H. Leach  
President and CEO

Dated: 9/27/00

4. Professional Engineer Statement:

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

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

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

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

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

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

*Thomas F. Hardy*  
\_\_\_\_\_  
Signature

*9/7/01*  
\_\_\_\_\_  
Date

(seal) *THS*

\* Attach any exception to certification statement.



**Construction/Modification Information**

1. Description of Proposed Project or Alterations:

**This application requests the elimination of Condition III.9. of Construction Permit No. 1110004-003-AC; PSD FL-303.**

2. Projected or Actual Date of Commencement of Construction:

3. Projected Date of Completion of Construction:

**Application Comment**

**A description of the request is attached in the letter dated August 14, 2001. The request does not change any applicable emission limits or applicable regulatory requirements.**

**Golder Associates Inc.**

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



August 14, 2001

0137568

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

Attention: Mr. Joseph Kahn, P.E., New Source Review Section

RE: TROPICANA PRODUCTS, INC., FORT PIERCE CITRUS PROCESSING PLANT  
DEP FILE NO. 1110004-003-AC (PSD-FL-303)

Dear Joe:

This correspondence is submitted on behalf of Tropicana Products, Inc. to request a change in a permit condition related to the citrus feed mill peel dryers and waste heat evaporators. Specifically, it is requested that Section III, Condition 9, requiring records for the operation of the dryer bypass stacks to be omitted from the permit.

The bypass stack is a misnomer. The purpose of the stack is for pressure relief in the waste heat evaporator. For the Fort Pierce Plant, these pressure relief stacks operate intermittently and at generally low flow (10 percent or less of the dryer flow). The relief stack is necessary to balance the airflow between the dryer and the waste heat evaporator. Excessive pressure can damage the dryer.

The intermittent small amount of emissions are not in excess of the applicable emission limit and therefore not excess emissions as defined in Rule 62-210.200 F.A.C. and provided for in Rule 62-210.700 F.A.C. An excess emission, as defined in the Department's rules, must be in excess of any applicable Department rule. Any emission from the relief stack, either separate from or combined with the emissions from the waste heat evaporator would not exceed an applicable Department rule. This includes visible emissions and the process weight table.

This conclusion has been confirmed through testing performed at the Bradenton Citrus Processing Plant. One particular dryer at the Bradenton Plant has pressure relief problems where dryer exhaust gases of over 30 percent of the dryer flow exits the relief stack and occurs over extended periods. This has necessitated testing of both the relief stack and the waste heat evaporator stack. Testing of this dryer (Dryer No. 2) has confirmed particulate matter (PM) emissions from the relief stack in the range of 5 to 10 pounds per hour (lb/hr) for over 30 percent of the flow. When combined with the PM emissions from the waste heat evaporator the total emissions are about one-third of the applicable process weight limit. Even if all the flow were out of the pressure relief stack, the process weight limit would not be exceeded.

At the Fort Pierce Plant, the pressure relief stack does not operate as often or at the flow rates experienced at Bradenton's Dryer No. 2. As shown in the PSD Application for the juice extractors, the actual PM emissions for 1998 and 1999 from both dryers at Fort Pierce were 5.3 lb/hr for both dryers compared to the process weight limit of 32.4 lb/hr (refer to Table 2-4). For 2000 and 2001, the



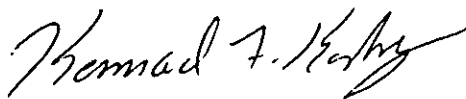
average PM emissions, for both dryers, were 3.94 lb/hr. Given the low actual emissions from the waste heat evaporators, the low flow to the relief stack and similarity in dryer capacity and process, it can be concluded that there would not be an excess emission in the event some of the dryer flow exhausts through the relief stack. Therefore, Condition III. 9. is not necessary.

Moreover, there is currently no physical way to record the operational hours when flow exhausts through the relief stack. The system is balanced by the flows of the dryer forced draft fans and the waste heat evaporator induced fans. There is no electronic control system that could be used to monitor or record a condition when the relief stack is used.

The opportunity to provide this request is appreciated. Please call if you have any questions.

Sincerely,

GOLDER ASSOCIATES INC.



Kennard F. Kosky, P.E.  
Principal

KFK/jkw

cc: Richard Coyle, Tropicana Products, Inc.  
Douglas Foster, Tropicana Products, Inc.  
Scott Davis, Tropicana Products, Inc.