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1. Article Addressed to:	3. Service Type	
Mr. Richard Coyle Director of Operators Tropicana Products, Inc. 6500 Glades Cutoff Road Ft. Pierce, FL 34981	<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.	
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2. Article Number (Copy from service label)		
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PS Form 3800, May 2000		See Reverse for Instructions

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Department of Environmental Protection

Jeb Bush
Governor

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

David B. Struhs
Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Richard Coyle, Director of Operators
Tropicana Products, Inc.
6500 Glades Cutoff Road
Fort Pierce, FL 34981

Re: Minor Modification – Dryer Bypass Stack Monitoring
Tropicana Products, Inc. - Fort Pierce Citrus Processing Plant
Project No. 1110004-005-AC
Draft Air Permit No. PSD-FL-303B

Dear Mr. Coyle:

Tropicana Products, Inc. operates the Fort Pierce Citrus Processing Plant, which is located in Fort Pierce at 6500 Glades Cutoff Road in St. Lucie County, Florida. On September 17, 2001, Tropicana applied to the Department requesting a modification to air construction permit number PSD-FL-303 to remove the daily monitoring requirement for the dryer bypass stack. The Department has reviewed the modification request and Condition No. 9 in Section III.B of the referenced permit is hereby modified as follows:

From:

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.]

To:

9. Records of Operation of Dryer Bypass Stack Required: During each required test run conducted on a dryer, the permittee shall operate the processing line to prevent exhausting through the bypass stack to the maximum extent possible. For each such test run, the operator shall record the number of minutes that emissions are exhausted through the bypass stack. If the bypass stack operates more than 6 minutes during any run, the Compliance Authority may require additional testing. Bypass stack operation shall be summarized in the test report. [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. This permit does not change those limitations.]

A copy of this letter shall be filed with the referenced permit and shall become part of the permit. This permit modification is issued pursuant to Chapter 403, Florida Statutes.

Any party to this order (permit modification) has the right to seek judicial review of it under Section 120.68, F.S., by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel, Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000, and by filing a copy of

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the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within thirty days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida.



Howard L. Rhodes, Director
Division of Air Resources Management

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this permit modification was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 12/20/01 to the persons listed:

Mr. Richard Coyle, Tropicana *
Mr. Douglas Foster, Tropicana
Mr. Ken Kosky, Golder Associates
Mr. Isidore Goldman, DEP Southeast District

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.

 12/20/01
(Clerk) (Date)

FINAL DETERMINATION

Tropicana Products, Inc. - Fort Pierce Citrus Processing Plant
Permit Modification, Dryer Bypass Stack Monitoring

NOTICE AND PUBLICATION

The Department distributed a draft permit and public notice package on November 15, 2001 for a project to revise the monitoring requirement for the dryer bypass stack from daily to only during required tests. The applicant published the required "Public Notice" in The Tribune of St. Lucie County on November 30, 2001. The Department received the proof of publication on December 10, 2001.

COMMENTS

The Department received no comments on the proposed minor draft modification.

CONCLUSION

The final action of the Department is to issue the permit modification with only minor typographical corrections. Additional details of this analysis may be obtained by contacting the project engineer at 850/488-0114 or the Department's Bureau of Air Regulation at Mail Station #5505, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400.



Department of Environmental Protection

Jeb Bush
Governor

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

David B. Struhs
Secretary

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:	September 20, 2002

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.

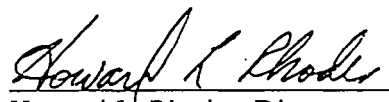
STATEMENT OF BASIS

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


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 applicant proposed to add the extractors in two phases, five extractors during the 2000-2001 season, and eleven during the 2001-2002 season. However, the applicant's planned installation schedule is subject to change. [Note: The applicant is cautioned to be aware of the requirements of condition 6 of Section II of this permit related to the expiration of this permit.] 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
NO _x	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, NO_x, 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), NO_x, 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

AIR CONSTRUCTION PERMIT
SECTION I. FACILITY INFORMATION

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.

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 time clock
January 8, 2001	Distributed Notice of Intent to Issue and supporting documents
February 15, 2001	Notice of Intent published in the Tribune (St. Lucie County)

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 September 20, 2002. 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

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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 drivers 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.

AIR CONSTRUCTION PERMIT

SECTION II. FACILITY-WIDE SPECIFIC CONDITIONS

(c) Reasonable precautions for this facility include the following:

- Paving and maintenance of roads, parking areas and yards.
- 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.]

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AIR CONSTRUCTION PERMIT

SECTION II. FACILITY-WIDE SPECIFIC CONDITIONS

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 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

AIR CONSTRUCTION PERMIT
SECTION II. FACILITY-WIDE SPECIFIC CONDITIONS

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 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.]

AIR CONSTRUCTION PERMIT
SECTION II. FACILITY-WIDE SPECIFIC CONDITIONS

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 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 Drivers: 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 Drivers: 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.

Memorandum

Florida Department of Environmental Protection

TO: Howard Rhodes, Division of Air Resources Management

THRU: Clair Fancy, Bureau of Air Regulation *ag for CHF*
Al Linero, New Source Review Section *AAL*

FROM: Jeff Koerner, New Source Review Section *JK*

DATE: December 13, 2001

SUBJECT: Air Permit No. PSD-FL-303B
Project No. 1110004-005-AC
Tropicana Products, Inc. - Fort Pierce Citrus Processing Plant
Permit Modification – Dryer Bypass Stack Monitoring

The final permit modification for this project is attached for your approval and signature. The modification letter revises the monitoring requirement for the dryer bypass stack from daily to only during required tests. I spoke about this project with the original permit engineer, Joe Kahn. He stated that this was a reasonable change and would not affect the PSD status for the original project. We distributed an "Intent to Issue Permit" package on November 15, 2001. The applicant published the "Public Notice" in The Tribune of St. Lucie County on November 30, 2001. Day 90 is January 22, 2002. **I recommend your approval and signature.**

Attachments

HLR/CHF/AAL/jfk



RECEIVED

DEC 10 2001

Via Certified Mail
December 6, 2001

BUREAU OF AIR REGULATION

Mr. C.H. Fancy, P.E., Chief
Bureau of Air Regulation
Florida Department of Environmental Protection
Marjory Stoneman Douglas Building
Tallahassee, FL 32399-3000

RE: Public Notice of Intent to Issue Permit
Minor Modification – Dryer Bypass Stack Monitoring
Tropicana Products, Inc. – Fort Pierce Citrus Processing Plant
Project No. 1110004-005-AC
Draft Air Permit No. PSD-FL-303B

Dear Mr. Fancy:

Attached is the original Public Notice of Intent to Issue Air Construction Permit Modification for Tropicana Products, Fort Pierce, published in The Tribune on November 30, 2001.

Please feel free to call me at (561)-465-2030 ext-443 if you have any questions or need additional information.

Sincerely,

Scott Davis
Manager, Environmental Operations

CC: Doug Foster, Tropicana Products



THE TRIBUNE
ST. LUCIE COUNTY, FLORIDA
 600 Edwards Road, Ft. Pierce, FL 34982

AFFIDAVIT OF PUBLICATION

STATE OF FLORIDA
 COUNTY OF ST. LUCIE

Before the undersigned authority personally appeared, Lynn Ferraro, General Manager, Kathy LeClair, Business Manager or Bob Rossi, Circulation Manager of The Tribune, a daily newspaper published at

Fort Pierce in St. Lucie County, Florida; that the attached copy of advertisement was published in The Tribune in the following issues below. Affiant further says that the said Tribune is a newspaper published at Fort Pierce in said St. Lucie County, Florida and that the said newspaper has heretofore been continuously published in said St. Lucie County, Florida daily and distributed in St. Lucie County, Florida, for a period of one year next preceding the first publication of attached copy of advertisement; and affiant further says that he/she has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper. The Tribune has been entered as second class matter at the Post Office in Fort Pierce, St. Lucie County, Florida and has been for a period of one year next preceding the first publication of the attached copy of advertisement.

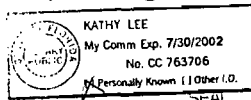
Ad #	Name	Date	Price Per Day	PO #
2294705	TROPICANA PRODUCTS	11/30/2001	\$315.00	
			Total	\$315.00

Subscribed and sworn to me before this date:

11/30/2001

[Signature]

Kathy Lee
 Notary Public



PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT MODIFICATION
 STATE OF FLORIDA
 DEPARTMENT OF ENVIRONMENTAL PROTECTION
 Project No. 1110004-005-AC
 Draft Air Permit No. PSD-FL-303B
 Tropicana Products, Inc.
 Fort Pierce Citrus Processing Plant
 St. Lucie County

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit modification to the applicant, Tropicana Products, Inc., for the Fort Pierce Citrus Processing Plant, which is located at 6500 Glades Cutoff Road in Fort Pierce, Florida. The applicant's authorized representative is Mr. Richard Coyle, Director of Operations. The applicant's mailing address is 6500 Glades Cutoff Road, Fort Pierce, FL 34981.

The applicant requests removal of an existing permit condition that requires daily monitoring of the dryer bypass stack operation. The proposed draft permit modification removes the daily monitoring requirement but requires dryer bypass stack monitoring during the annual emissions tests to ensure that the maximum pollutant emissions are being measured. This change is not expected to result in any increase in actual pollutant emissions.

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

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under Sections 120.569 and 120.57, F.S. This 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 32399-0000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen (14) days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within fourteen (14) days of publication of the public notice or within fourteen (14) days of receipt of this notice of intent, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Department for notice of agency action may file a petition within fourteen (14) 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 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, F.A.C.

A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner, the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when the 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 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 to be disputed and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

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

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

Department of Environmental Protection
 Bureau of Air Regulation
 2600 Blair Stone Road, MS #5505
 Tallahassee, Florida, 32399-2400
 Telephone: 850/488-0114
 Fax: 850/922-6977

Department of Environmental Protection
 Southeast District Office
 Air Resources Section
 P.O. Box 15425 (400 N. Congress Avenue)
 West Palm Beach, FL 33416-5425
 Telephone: 561/681-6600
 Fax: 561/681-6790

The complete project file includes the application, Technical Evaluation and Preliminary Determination, Draft Letter Modification, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Department's reviewing engineer for this project for additional information at the address and phone numbers listed above.

Publish: November 30, 2001

SENDER: COMPLETE THIS SECTION

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

1. Article Addressed to:

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

2. Article Number (Copy from service label)

7000 2870 0000 7028 2812

PS Form 3811, July 1999

Domestic Return Receipt

102595-99-M-1789

COMPLETE THIS SECTION ON DELIVERY

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

11-17-01

C. Signature

Richard Coyle

- Agent
- Addressee

D. Is delivery address different from item 1? Yes

If YES, enter delivery address below: No

3. Service Type

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

4. Restricted Delivery? (Extra Fee)

Yes

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

OFFICIAL USE

7000 2870 0000 7028 2812

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

Postmark
Here

Sent To Richard Coyle
 Street, Apt. No., or PO Box No. 6500 Glades Cutoff Road
 City, State, ZIP+4 Ft. Pierce, FL 34981

PS Form 3800, May 2000

See Reverse for Instructions



Department of Environmental Protection

Jeb Bush
Governor

Marjory Stoneman Douglas Building
3900 Commonwealth Boulevard
Tallahassee, Florida 32399-3000

David B. Struhs
Secretary

November 13, 2001

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Richard Coyle, Director of Operators
Tropicana Products, Inc.
6500 Glades Cutoff Road
Fort Pierce, FL 34981

Re: Minor Modification – Dryer Bypass Stack Monitoring
Tropicana Products, Inc. - Fort Pierce Citrus Processing Plant
Project No. 1110004-005-AC
Draft Air Permit No. PSD-FL-303B

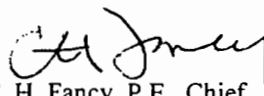
Dear Mr. Coyle:

Enclosed is one copy of the draft letter modification that revises the requirement to conduct daily monitoring of the dryer bypass stack (Condition No. 9 in Section III.B.) in Air Permit No. PSD-FL-303. The Department's "Technical Evaluation and Preliminary Determination", "Intent to Issue Permit", and the "Public Notice of Intent to Issue Permit" are also included.

The "Public Notice of Intent to Issue 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, Administrator of the New Source Review Section, at the above letterhead address. If you have any other questions, please contact Jeff Koerner at 850/921-9536.

Sincerely,


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

CHF/AAL/jfk

Enclosures

"More Protection, Less Process"

Printed on recycled paper.

(Draft Letter Modification)

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Richard Coyle, Director of Operators
Tropicana Products, Inc.
6500 Glades Cutoff Road
Fort Pierce, FL 34981

Re: Minor Modification – Dryer Bypass Stack Monitoring
Tropicana Products, Inc. - Fort Pierce Citrus Processing Plant
Project No. 1110004-005-AC
Draft Air Permit No. PSD-FL-303B

Dear Mr. Coyle:

Tropicana Products, Inc. operates the Fort Pierce Citrus Processing Plant, which is located in Fort Pierce at 6500 Glades Cutoff Road in St. Lucie County, Florida. On September 17, 2001, Tropicana applied to the Department requesting a modification to air construction permit number PSD-FL-303 to remove the daily monitoring requirement for the dryer bypass stack. The Department has reviewed the modification request and Condition No. 9 in Section III.B. of the referenced permit is hereby modified as follows:

From:

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.]

To:

9. Records of Operation of Dryer Bypass Stack Required: During each required test run conducted on a dryer, the permittee shall operate the processing line to prevent exhausting through the bypass stack to the maximum extent possible. For each such test run, the operator shall record the number of minutes that emissions are exhausted through the bypass stack. If the bypass stack operates more than 6 minutes during any run, the Compliance Authority may require additional testing. Bypass stack operation shall be summarized in the test report. [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.]

A copy of this letter shall be filed with the referenced permit and shall become part of the permit. This permit modification is issued pursuant to Chapter 403, Florida Statutes.

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

Executed in Tallahassee, Florida.

Howard L. Rhodes, Director
Division of Air Resources Management

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this permit modification was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on _____ to the persons listed:

Mr. Richard Coyle, Tropicana *
Mr. Douglas Foster, Tropicana
Mr. Ken Kosky, Golder Associates
Mr. Isidore Goldman, DEP Southeast District

Clerk Stamp

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

(Clerk)

(Date)

**TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION**

PROJECT

Project No. 1110004-005-AC
Draft Air Permit No. PSD-FL-303B
Minor Modification – Bypass Stack Monitoring

COUNTY

St. Lucie County

APPLICANT

Tropicana Products, Inc.
Fort Pierce Citrus Processing Plant
ARMS Facility ID No. 1110004

**PERMITTING
AUTHORITY**

Florida Department of Environmental Protection
Division of Air Resources Management
Bureau of Air Regulation
New Source Review Section



November 13, 2001

{Filename: 303B TEPD.doc}

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

1. GENERAL INFORMATION

Applicant Name and Address

Tropicana Products, Inc.
6500 Glades Cutoff Road
Fort Pierce, FL 34981

Authorized Representative:

Mr. Richard Coyle, Director of Operators

Processing Schedule

09/17/01 Received application; complete.

Facility Description and Location

Tropicana Products, Inc. operates a citrus processing plant (SIC No. 2037) at 6500 Glades Cutoff Road in Fort Pierce, Florida. The UTM coordinates are: Zone 17; 561.0 km E and 3028.1 km N. This is an area that is in attainment (or designated as unclassifiable) for all air pollutants subject to the Florida and National Ambient Air Quality Standards (NAAQS).

Regulatory Categories

Title III: Based on the Title V permit, the facility is a major source of hazardous air pollutants (HAP).

Title IV: Based on the Title V permit, the existing facility is not subject to the acid rain provisions of the Clean Air Act.

Title V: The facility is a Title V major source of air pollution because potential emissions of at least one regulated pollutant exceed 100 tons per year. Regulated pollutants include pollutants such as carbon monoxide (CO), nitrogen oxides (NO_x), particulate matter (PM/PM₁₀), sulfur dioxide (SO₂), and volatile organic compounds (VOC).

PSD: Because potential emissions are greater than 250 tons per year for at least one regulated air pollutant, the facility is a major source of air pollution in accordance with the requirements of the Prevention of Significant Deterioration (PSD) of Air Quality Program (Rule 62-212.400, F.A.C.). Projects resulting in net emissions increases greater than the Significant Emissions Rates specified in Table 62-212.400-2, F.A.C. are subject to the PSD new source preconstruction review requirements.

NSPS: The existing PSD air permit does not identify any units subject to the New Source Performance Standards of 40 CFR 60.

2. PROJECT DESCRIPTION

The Department previously issued a PSD air permit to construct additional citrus juice extractors at the existing facility. In addition to other equipment, the permit included the following emission units.

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

The final permit included the following condition in Section III.B. regulating these units.

“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.]”

The applicant requests removal of this requirement because:

- The bypass stack is used for pressure relief to balance the airflow between the dryer and waste heat evaporator.

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

Monitoring the pressure relief is unnecessary because it operates intermittently and infrequently at very low flows, typically 10% or less of the total dryer flow.

- Emissions are not believed to be in excess of the standards imposed by the process weight table because of the very low flows. Testing at another citrus processing plant that exhausted 30% of the dryer flow through the pressure relief indicated that particulate matter emissions were approximately a third of the emission standard.

3. DEPARTMENT'S REVIEW

The Department believes that this monitoring is important during at least each required emissions test performed on the dryer. The Department proposes to change the permit condition to the following.

- “9. Records of Operation of Dryer Bypass Stack Required: During each required stack test run conducted on a dryer, the permittee shall operate the processing line to prevent exhausting through the bypass stack to the maximum extent possible. For each such test run, the operator shall record the number of minutes that emissions are exhausted through the bypass stack. If the bypass stack operates more than 6 minutes during any run, the Compliance Authority may require additional testing. Bypass stack operation shall be summarized in the test report. [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.]”

The proposed change reduces the daily monitoring requirement to monitoring only during the required emissions stack tests. In addition, it ensures that maximum pollutant emissions are being measured during each required emissions test run. This change will not result in increased actual emissions and the modification is not subject to PSD review.

4. PRELIMINARY DETERMINATION

The Department makes a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations as conditioned by the draft permit. This determination is based on a technical review of the complete application, reasonable assurances provided by the applicant, and the specific conditions of the draft permit. Jeff Koerner is the project engineer responsible for reviewing the application and drafting the permit. Additional details of this analysis may be obtained by contacting the project engineer at the Department's Bureau of Air Regulation at Mail Station #5505, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400.

In the Matter of an
Application for Air Permit by:

Tropicana Products, Inc.
6500 Glades Cutoff Road
Fort Pierce, FL 34981

Authorized Representative:

Mr. Richard Coyle, Director of Operators

Project No. 1110004-005-AC
Draft Air Permit No. PSD-FL-303B
Fort Pierce Citrus Processing Plant
Minor Modification, Bypass Stack Monitoring
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 modification (copy of draft attached) for the proposed project as detailed in the application and the enclosed Technical Evaluation and Preliminary Determination, for the reasons stated below. The applicant, Tropicana Products, Inc., operates a citrus processing plant (SIC No. 2037) at 6500 Glades Cutoff Road in Fort Pierce, Florida. On September 17, 2001, Tropicana applied to the Department for a permit modification to remove the requirement to monitor the dryer bypass stack operation on a daily basis.

The Department has permitting jurisdiction under the provisions of Chapter 403 of the Florida Statutes (F.S.), and Chapters 62-4, 62-210, and 62-212 of the Florida Administrative Code (F.A.C.). The above actions are not exempt from permitting procedures. The Department has determined that an air construction permit is required to perform proposed work. The Department intends to issue this air construction permit based on the belief that the applicant has provided reasonable assurances 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) and (11), F.A.C.

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

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

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

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida, 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen (14) days of receipt of this notice of intent.

Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S. must be filed within fourteen (14) days of publication of the public notice or within fourteen (14) days of receipt of this notice of intent, whichever occurs first. Under Section 120.60(3), F.S. however, any person who asked the Department for notice of agency action may file a petition within fourteen (14) 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, F.A.C.

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

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

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

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. Mediation is not available in this proceeding. 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 Modification package (including the Public Notice of Intent to Issue Air Construction Permit Modification, Technical Evaluation and Preliminary Determination, and the Draft Letter Modification) was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 11/15/01 to the persons listed:

Mr. Richard Coyle, Tropicana *
Mr. Douglas Foster, Tropicana
Mr. Ken Kosky, Golder Associates
Mr. Isidore Goldman, DEP Southeast District

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.

Victoria Gibson
(Clerk)

11/15/01
(Date)

PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT MODIFICATION

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

Project No. 1110004-005-AC
Draft Air Permit No. PSD-FL-303B

Tropicana Products, Inc.
Fort Pierce Citrus Processing Plant

St. Lucie County

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit modification to the applicant, Tropicana Products, Inc., for the Fort Pierce Citrus Processing Plant, which is located at 6500 Glades Cutoff Road in Fort Pierce, Florida. The applicant's authorized representative is Mr. Richard Coyle, Director of Operators. The applicant's mailing address is 6500 Glades Cutoff Road, Fort Pierce, FL 34981.

The applicant requests removal of an existing permit condition that requires daily monitoring of the dryer bypass stack operation. The proposed draft permit modification removes the daily monitoring requirement, but requires dryer bypass stack monitoring during the annual emissions tests to ensure that the maximum pollutant emissions are being measured. This change is not expected to result in any increase in actual pollutant emissions.

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

The Department will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57, F.S., before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below. Mediation is not available in this proceeding.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida, 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen (14) days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S. must be filed within fourteen (14) days of publication of the public notice or within fourteen (14) days of receipt of this notice of intent, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Department for notice of agency action may file a petition within fourteen (14) 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, F.A.C.

A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner, the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when petitioner received notice of the agency action or proposed action; (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

NOTICE TO BE PUBLISHED IN THE NEWSPAPER

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

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

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

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

Department of Environmental Protection
Bureau of Air Regulation
(111 S. Magnolia Drive, Suite 4)
2600 Blair Stone Road, MS #5505
Tallahassee, Florida, 32399-2400
Telephone: 850/488-0114
Fax: 850/922-6979

Department of Environmental Protection
Southeast District Office
Air Resources Section
P.O. Box 15425 (400 N. Congress Avenue)
West Palm Beach, FL 33416-5425
Telephone: 561/681-6600
Fax: 561/681-6790

The complete project file includes the application, Technical Evaluation and Preliminary Determination, Draft Letter Modification, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Department's reviewing engineer for this project for additional information at the address and phone numbers listed above.

NOTICE TO BE PUBLISHED IN THE NEWSPAPER

Memorandum

Florida Department of Environmental Protection

TO: Clair Fancy, Chief - Bureau of Air Regulation
THROUGH: Al Linero, Administrator - New Source Review Section *aly 11/13*
FROM: Jeff Koerner, New Source Review Section *JK*
DATE: November 13, 2001
SUBJECT: Minor Modification – Dryer Bypass Stack Operation
Tropicana Products, Inc. - Fort Pierce Citrus Processing Plant
Project No. 1110004-005-AC
Draft Air Permit No. PSD-FL-303B

Attached for your review are the following items:

- Intent to Issue Permit and Public Notice Package;
- Technical Evaluation and Preliminary Determination;
- Draft Letter Modification; and
- PE Certification

The applicant requested removal of a permit condition to monitor the dryer bypass stack on a daily basis. The draft letter modification removes the daily monitoring requirement, but requires dryer bypass stack monitoring during the annual emissions tests to ensure that the maximum pollutant emissions are being measured. Day #74 is November 30, 2001. I recommend your approval of the attached draft letter modification for this project.

CHF/AAL/jfk

Attachments

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

P.E. CERTIFICATION STATEMENT

PERMITTEE

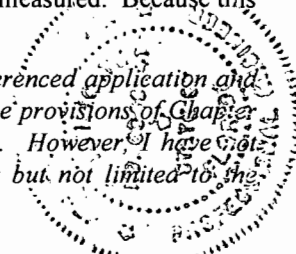
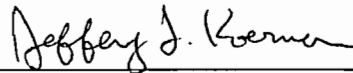
Tropicana Products, Inc.
Fort Pierce Citrus Processing Plant
6500 Glades Cutoff Road
Fort Pierce, FL 34981

Project No. 1110004-005-AC
Draft Permit No. PSD-FL-303B
Dryer Bypass Stack Monitoring

PROJECT DESCRIPTION

Tropicana Products, Inc. operates a citrus processing plant (SIC No. 2037) at 6500 Glades Cutoff Road in Fort Pierce, Florida. Previously, the Department issued a PSD air permit to construct additional citrus juice extractors at the existing facility, which included a condition to monitor the dryer bypass stack on a daily basis. The applicant requests removal of this requirement because it is burdensome and operation of the bypass stack is unlikely to result in particulate matter emissions in excess of the process weight table. The Department proposes a revised condition that only requires monitoring of the dryer bypass stack during required annual emissions stack tests to ensure that the maximum pollutant emissions are being measured. Because this change is not expected to result in increased actual emissions, PSD review does not apply.

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



Jeffery F. Koerner, P.E.
Registration Number: 49441

11-13-01

(Date)



RECEIVED

SEP 17 2001

BUREAU OF AIR REGULATION

VIA CERTIFIED MAIL- RETURNED RECEIPT REQUESTED

September 13, 2001

Mr. C.H. Fancy, P.E., Chief
Bureau of Air Regulation
FL Dept. of Environmental Protection
2600 Blair Stone Road, Mail Station 5505
Tallahassee, FL 32399-2400

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

RE: File No. 1110004-003-AC, PSD-FL-303
Tropicana Products Permit Condition Change Request

Dear Mr. Kahn:

Enclosed please find four copies of the permit modification application that Ken Kosky from Golder Associates has previously discussed with you. The application requests the elimination of Condition III.9. of Construction Permit No. 1110004-003-AC; PSD FL-303.

If you have any questions or need additional information, I can be contacted at 561-465-2030 ext-443.

Sincerely

Scott Davis
Manager, Environmental Operations
Tropicana Products, Inc., Fort Pierce Facility

CC: Doug Foster, Tropicana Products, Inc.

J. Melstrom, SED
G. Bynall, NPS
G. Waddy, EPA

Best Available Copy

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

RECEIVED
AUG 17 2001
Bureau of Air Monitoring
& Mobile Sources

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) 111 0004-005-AC

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,

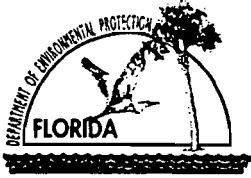
GOLDER ASSOCIATES INC.



Kennard F. Kosky, P.E.
Principal

KFK/jkw

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



Department of Environmental Protection

Division of Air Resources Management

APPLICATION FOR AIR PERMIT - TITLE V SOURCE

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

I. APPLICATION INFORMATION

Identification of Facility

1. Facility Owner/Company Name: Tropicana Products, Inc.	
2. Site Name: Ft. Pierce Citrus Processing Plant	
3. Facility Identification Number: 1110004 [] Unknown	
4. Facility Location: Street Address or Other Locator: 6500 Glades Cutoff Road City: Ft. Pierce County: St. Lucie Zip Code: 34981	
5. Relocatable Facility? [] Yes [X] No	6. Existing Permitted Facility? [X] Yes [] No

Application Contact

1. Name and Title of Application Contact: Douglas E. Foster, Manager Environmental Affairs	
2. Application Contact Mailing Address: Organization/Firm: Tropicana Products, Inc. Street Address: 1001 13th Avenue, East City: Bradenton State: FL Zip Code: 34208	
3. Application Contact Telephone Numbers: Telephone: (941) 742 - 2748 Fax: (941) 742 - 3768	

Application Processing Information (DEP Use)

1. Date of Receipt of Application:	<i>8-17-01</i>
2. Permit Number:	<i>1110004-005-AC</i>
3. PSD Number (if applicable):	<i>PSD-FL-303B</i>
4. Siting Number (if applicable):	

Purpose of Application

Air Operation Permit Application

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

[] Initial Title V air operation permit for an existing facility which is classified as a Title V source.

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

Current construction permit number: _____

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

Current construction permit number: _____

Operation permit number to be revised: _____

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

Operation permit number to be revised/corrected: _____

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

Operation permit number to be revised: _____

Reason for revision: _____

Air Construction Permit Application

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


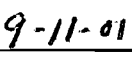
[] Air construction permit to construct or modify one or more emissions units.

[] Air construction permit to make federally enforceable an assumed restriction on the potential emissions of one or more existing, permitted emissions units.

[] Air construction permit for one or more existing, but unpermitted, emissions units.

See Application Comment

Owner/Authorized Representative or Responsible Official

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

* Attach letter of authorization if not currently on file.

Professional Engineer Certification

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

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



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 [], 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.

Yusuf F. Kady

Signature

9/7/01

Date

Attach any exception to certification statement.

Scope of Application

Emissions Unit ID	Description of Emissions Unit	Permit Type	Processing Fee
001	Citrus feed mill peel dryer/waste heat evaporator #1	ACM1	
004	Citrus feed mill peel dryer/waste heat evaporator #2	ACM1	

Application Processing Fee

Check one: [] Attached - Amount: \$: _____ [] Not Applicable

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

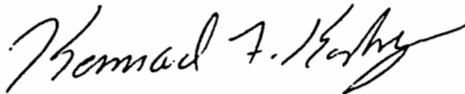
average PM emissions, for both dryers, were 3.94 lb/hr. Given the low actual emissions from the waste heat evaporators, the low flow to the relief stack and similarity in dryer capacity and process, it can be concluded that there would not be an excess emission in the event some of the dryer flow exhausts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

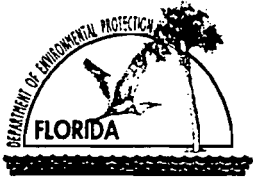
GOLDER ASSOCIATES INC.



Kennard F. Kosky, P.E.
Principal

KFK/jkw

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



Department of Environmental Protection

Division of Air Resources Management

APPLICATION FOR AIR PERMIT - TITLE V SOURCE

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

I. APPLICATION INFORMATION

Identification of Facility

1. Facility Owner/Company Name: Tropicana Products, Inc.	
2. Site Name: Ft. Pierce Citrus Processing Plant	
3. Facility Identification Number: 1110004 <input type="checkbox"/> Unknown	
4. Facility Location: Street Address or Other Locator: 6500 Glades Cutoff Road City: Ft. Pierce County: St. Lucie Zip Code: 34981	
5. Relocatable Facility? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	6. Existing Permitted Facility? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

Application Contact

1. Name and Title of Application Contact: Douglas E. Foster, Manager Environmental Affairs	
2. Application Contact Mailing Address: Organization/Firm: Tropicana Products, Inc. Street Address: 1001 13th Avenue, East City: Bradenton State: FL Zip Code: 34208	
3. Application Contact Telephone Numbers: Telephone: (941) 742 - 2748 Fax: (941) 742 - 3768	

Application Processing Information (DEP Use)

1. Date of Receipt of Application:	8-17-01
2. Permit Number:	1110004-005-AC
3. PSD Number (if applicable):	PSD-FL-303B
4. Siting Number (if applicable):	

11-13-01

~~A1~~

I revised the specific condition so that they only had to monitor the dryer bypass during stack testing. Previous permit required daily monitoring. Joe was OK with this decision. Jeff

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: _____

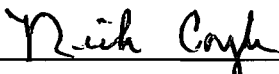
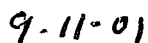
Air Construction Permit Application

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

* Attach letter of authorization if not currently on file.

Professional Engineer Certification

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

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

HL 

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 [], if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.

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

Signature

Date

* Attach any exception to certification statement.

Scope of Application

Emissions Unit ID	Description of Emissions Unit	Permit Type	Processing Fee
001	Citrus feed mill peel dryer/waste heat evaporator #1	ACM1	
004	Citrus feed mill peel dryer/waste heat evaporator #2	ACM1	

Application Processing Fee

Check one: [] Attached - Amount: \$: _____ [X] Not Applicable

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.

SENDER: COMPLETE THIS SECTION

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

1. Article Addressed to:

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

2. Article Number (Copy from service label)

7000 2870 0000 7028 3024

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly)

B. Date of Delivery

10-27-01

C. Signature

X Howard R. Coyle

 Agent AddresseeD. Is delivery address different from item 1? YesIf YES, enter delivery address below: No

3. Service Type

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

4. Restricted Delivery? (Extra Fee)

 Yes

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)

OFFICIAL USE


7028 3024 0000 2870 0000 2870

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

Sent To
 Richard Coyle
 Street, Apt. No., or PO Box No.
 6500 Glades Cutoff Road
 City, State, ZIP+4
 Ft. Pierce, FL 34981

PS Form 3800, May 2000

See Reverse for Instructions

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none"> Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 	A. Received by (Please Print Clearly)	B. Date of Delivery 11-17-01
1. Article Addressed to: Mr. Richard Coyle Director of Operators Tropicana Products, Inc. 6500 Glades Cutoff Road Ft. Pierce, FL 34981	C. Signature  <input type="checkbox"/> Agent <input type="checkbox"/> Addressee	
2. Article Number (Copy from service label) 7000 2870 0000 7028 2812	D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No	
PS Form 3811, July 1999	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.	4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes

U.S. Postal Service CERTIFIED MAIL RECEIPT (Domestic Mail Only; No Insurance Coverage Provided)	
OFFICIAL USE	
Postage \$ Certified Fee Return Receipt Fee (Endorsement Required) Restricted Delivery Fee (Endorsement Required) Total Postage & Fees \$	Postmark Here
Sent To: Richard Coyle Street, Apt. No., or PO Box No. 6500 Glades Cutoff Road City, State, ZIP+4 Ft. Pierce, FL 34981	
PS Form 3800, May 2000 See Reverse for Instructions	

7000 2870 0000 7028 2812