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BUREAU OF AIR REGULATION

May 13, 2002

CERTIFIED MAIL: Return Receipt Requested

Ms. Cindy Phillips, P.E.
FDEP Bureau of Air Regulation
MS5505
2600 Blair Stone Road
Tallahassee, Fl. 32399-2400

Mr. Doug Neeley
Air, Pesticides, and Toxics Management Division
USEPA Region IV
61 Forsyth Street, SW
Atlanta, GA 30303-8960

RE: Clean Air Act Section 112(j) Notification Information
Tropicana Products, Inc.
Title V Permit No. 1110004-002-AV

Dear Ms. Phillips:

The purpose of this letter is to provide information relative to Section 112(j) of the Clean Air Act as amended in 1990 which pertains to the development of Maximum Achievable Control Technology (MACT) standards. Section 112(j) requires that owners of a major source of hazardous air pollutants (HAPs) in an affected industry source category submit the information listed below to the permitting authority (i.e. the State of Florida) with a copy submitted to the United States Environmental Protection Agency (USEPA).

Tropicana Products, Inc. is submitting this Part 1 notification information without necessarily having determined that certain units, such as, but not limited to, the process heaters which serve its peel drying system or other process heater units at the facility, are subject to the Process Heaters or other MACT category. Tropicana is submitting information about these units as a precaution and reserves the right to contest that these units are subject to a MACT category. See, "NESHAPS for Source Categories: General Provisions; and Requirements for Control Technology Determinations for Major Sources in Accordance with Clean Air Act Sections 112(g) and 112(j)," 67 Fed. Reg. 16,582, 16,591 (April 5, 2002) (Final Rule) (stating that "If the section 112(j) deadline arrives before you can determine ... applicability, you should submit a Part 1 [notification]").

The Code of Federal Regulations, at 40 C.F.R. §63.53(a), directs that the following information is to be submitted in a Part 1 notification to the permitting authority:

1. The name, address (physical location), and brief description of the major source (facility);
2. An identification of the relevant industry source category(ies);
3. A list of the emission units belonging to the relevant industry source category(ies); and
4. An identification of any affected sources for which a Section 112(g) MACT determination has been made.

Subject to the conditions outlined herein, Tropicana hereby provides the following facility-specific information for each of these items:

1. **Name:** Tropicana Products, Inc.
Address: 6500 Glades Cut-Off Road, Fort Pierce, Florida 34981
Source Description:
The existing industrial complex includes citrus processing and juice extracting, packaging, warehousing, and distribution. Fruit is graded and carried to an extractor room where the juice is removed and pumped to either carton filling, plastic filling, aseptic storage or to evaporators for concentrate production.

The plant contains two citrus feed mills; two citrus pellet mills (including two pellet coolers); four process steam boilers; and a wastewater treatment system.
2. **Relevant Industry Source Categories:** Depending on the final form of the applicability portion of the MACT standard, the following industry source categories may be applicable to sources at the facility:
Industrial, Commercial, and Industrial Boilers and Indirect-fired Process Heaters; Organic Liquids Distribution (non-gasoline); Paint Stripping Operations, Plastic Parts (surface coating); and Reciprocating Internal Combustion Engines.
3. **List of the Emission Units Belonging to the Relevant Industry Source Categories:** This list is dependent on the final form of the applicability portion on the specific MACT standard.

Facility Emission Source	Potentially Relevant Industry Source Category
Auxiliary and Standby Boilers; Duct Burner System; Feed Mill Dryers	Industrial, Commercial, and Industrial Boilers and Indirect-fired Process Heaters
Diesel emergency generator	Reciprocating Internal Combustion Engines
Citrus Oils Handling and Storage	Organic Liquids Distribution (non-Gasoline)
Plastic Parts (Surface Coating)	Bottling

4. **Previous Section 112(g) MACT Determinations:** There have been no determinations under 112(g).

If you have any questions concerning the information provided, please contact Douglas Foster at 941-742-2748.

Sincerely,



Richard Coyle
Director of Operations