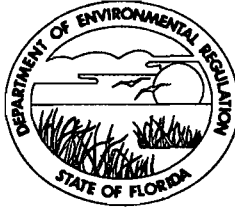


STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION
NOTICE OF PERMIT

Mr. Bernard W. McBee, Jr.
General Manager
TreeSweet Products Company, Inc.
100 Bell Avenue
Ft. Pierce, Florida 33482

December 19, 1986

Enclosed is Permit Number AC 56-117673 to TreeSweet Products Company, Inc. which authorizes the modification of an existing source to burn No. 6 fuel oil in Ft. Pierce, St. Lucie County, Florida. This permit is issued pursuant to Section 403, Florida Statutes.

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

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

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

Copies furnished to:

Wayne E. Griffin, P.E.
Isidore Goldman

CERTIFICATE OF SERVICE

This is to certify that this NOTICE OF PERMIT and all copies were mailed before the close of business on Dec. 22, 1986 to the listed persons.

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

Patricia G. Adams
Clerk

Dec. 22, 1986
Date

Final Determination

TreeSweet Products Company, Inc.
St. Lucie County
Ft. Pierce, Florida

Permit Number:
AC 56-117673

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

December 16, 1986

Final Determination
TreeSweet Products Company, Inc.: AC 56-117673
St. Lucie County

The construction permit application and attachments have been reviewed by the department. Public notice of the department's intent to issue was published in The News Tribune issue of November 7, 1986. The technical evaluation and preliminary determination were available for public inspection at the DER's Southeast Florida Subdistrict office and Bureau of Air Quality Management office.

There were no comments received. Therefore, it is recommended that the construction permit be issued as drafted.

DER

NOV 12 1986

BACIM

STATE OF FLORIDA
COUNTY OF ST. LUCIE

Before the undersigned authority personally appeared James J. McMillen or Kathleen K. LeClair, who on oath says that he/she is Publisher, Publisher's Secretary of The News Tribune, a daily newspaper published at Fort Pierce in St. Lucie County, Florida; that the attached copy of advertisement, being a legal notice in the matter of DER Intent

was published in said newspaper in the issues of 11/7/86

Affiant further says that the said News 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, each day and has been entered as second class mail matter at the post office in Fort Pierce, in said St. Lucie County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that he has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper. Sworn to and subscribed before me

This 7th day of November

A.D. 1986

Gloria Logroski
(SEAL) Notary Public

NOTARY PUBLIC STATE OF FLORIDA
MY COMMISSION EXP. DEC 13, 1987
DORIS L. TAYLOR GENERAL INS. BRO.

The Department gives notice of its intent to issue permit to TreeSweet Products Company, Inc. to use No. 6 fuel oil in its existing peel dryer/waste heat evaporator. An associated wet scrubber system will be used to control both particulate matter and sulfur dioxide emission. The proposed project will be located at the TreeSweet Products Company's existing facility in Ft. Pierce St. Lucie County, Florida. determination of best available control technology (BACT) was not required.

Persons whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative determination (hearing) in accordance with Section 120.57, Florida Statutes. The petition must conform to the requirements of Chapters 17-103 and 28-5, Florida Administrative Code, and must be filed (received) in the Department's Office of General Counsel, 2600 Blair Stone Road, Twin Towers Office Building, Tallahassee, Florida 32301, within fourteen (14) days of publication of this notice. Failure to file a petition within this time period constitutes a waiver of any right such person has to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the proposed agency action. Therefore, persons who may not wish to file a petition may wish to intervene in the proceeding. A petition for intervention must be filed pursuant to Rule 28-5.207, Florida Administrative Code, at least five (5) days before the final hearing and be filed with the hearing officer if one has been assigned at the Division of Administrative Hearings, Department of Administration, 2009 Apalachee Parkway, Tallahassee, Florida 32301. If no hearing officer has been assigned, the petition is to be filed with the Department's Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32301. Failure to petition to intervene within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, Florida Statutes.

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

Dept. of Environmental Regulation
Bureau of Air Quality Management
2600 Blair Stone Road
Tallahassee, Florida 32301
Dept. of Environmental Regulation
Southeast Florida Sub-district
2743 Southeast Morningside Blvd.
Fort St. Lucie, Florida 33492

Any person may send written comments on the proposed action to Mr. Bill Thomas at the department's Tallahassee address. All comments mailed within 14 days of the publication of this notice will be considered in the department's final determination.
PUBLISHED November 7, 1986.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

PERMITTEE:
TreeSweet Products Co., Inc.
P. O. Box 189
1000 Bell Avenue
Ft. Pierce, Florida 33454

Permit Number: AC 56-117673
Expiration Date: April 30, 1987
County: St. Lucie
Latitude/Longitude: 27° 24' 11"N
80° 20' 24"W
Project: Peel Dryer/Waste Heat
Evaporator with an Associated
Wet Scrubber Control System

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

For the modification to an existing source to fire new No. 6 fuel oil and natural gas as primary fuels and No. 2 fuel oil as a back-up, malfunction, and emergency fuel only. "New" means an oil which has been refined from crude oil and has not been used, and which may or may not contain additives. Maximum sulfur content for the No. 6 fuel oil shall not exceed 2.5% by weight.

The peel dryer/waste heat evaporator processes a maximum of 35 tons/hour of wet peel and is rated at 40 MMBtu/hr heat input. A wet scrubber system is used to control pollutant emissions.

The Standard Industrial Codes are: Industrial No. 2037-Frozen Juices, Fruit Juices and Vegetables. The Source Classification Codes are: Food and Agriculture-Fuel Fired Equipment-Process Heaters: 3-02-900-02 Residual Oil; 3-02-900-03 Natural Gas; and, 3-02-900-01 Distillate Oil (No. 2).

The UTM coordinates are Zone 17, 565.6 km East and 3031.3 km North.

The source shall be as reflected in the permit application, plans, documents, drawings, and amendments, except as otherwise noted on pages 5-8 of the Specific Conditions.

Attachments;

1. Application to Construct/Modify Air Pollution Sources, DER Form 17-2.202(1), received by DER's Southeast Florida Subdistrict office on March 17, 1986.
2. Mr. Tim Powell's letter dated March 19, 1986.
3. Mr. C. H. Fancy's letter dated April 15, 1986.
4. Mr. John Fredrick Lang's letter with attachment, May 26, 1986.
5. Mr. Wayne E. Griffin's letter with enclosures, May 29, 1986, and received June 2, 1986.

PERMITTEE:
TreeSweet Products Co., Inc.

Permit Number: AC 56-117673
Expiration Date: April 30, 1987

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and as such are binding upon the permittee and enforceable pursuant to the authority of Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is hereby placed on notice that the department will review this permit periodically and may initiate enforcement action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the department.
3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor 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 does not constitute a waiver of or approval of any other department permit that may be required for other aspects of the total project which are not addressed in the permit.
4. This permit conveys no title to land or water, does not constitute state recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the state. Only the Trustees of the Internal Improvement Trust Fund may express state opinion as to title.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, plant or aquatic life or property and penalties therefore caused by the construction or operation of this permitted source, nor does it allow the permittee to cause pollution in contravention of Florida Statutes and department rules, unless specifically authorized by an order from the department.

PERMITTEE: Permit Number: AC 56-117673
TreeSweet Products Co., Inc. Expiration Date: April 30, 1987

GENERAL CONDITIONS:

6. The permittee shall at all times properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized department personnel, upon presentation of credentials or other documents as may be required by law, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purpose of:

- a. Having access to and copying any records that must be kept under the conditions of the permit;
- b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sampling or monitoring any substances or parameters at any location reasonably necessary to assure compliance with this permit or department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately notify and provide the department with the following information:

- a. a description of and cause of non-compliance; and
- b. the period of noncompliance, including exact dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance.

PERMITTEE:
TreeSweet Products Co., Inc.

Permit Number: AC 56-117673
Expiration Date: April 30, 1987

GENERAL CONDITIONS:

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

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source, which are submitted to the department, may be used by the department as evidence in any enforcement case arising under the Florida Statutes or department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes.

10. The permittee agrees to comply with changes in department rules and Florida Statutes after a reasonable time for compliance, provided however, the permittee does not waive any other rights granted by Florida Statutes or department rules.

11. This permit is transferable only upon department approval in accordance with Florida Administrative Code Rules 17-4.12 and 17-30.30, as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the department.

12. This permit is required to be kept at the work site of the permitted activity during the entire period of construction or operation.

13. This permit also constitutes:

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

14. The permittee shall comply with the following monitoring and record keeping requirements:

- a. Upon request, the permittee shall furnish all records and plans required under department rules. The retention period for all records will be extended automatically, unless otherwise stipulated by the department, during the course of any unresolved enforcement action.

PERMITTEE:
TreeSweet Products Co., Inc.

Permit Number: AC 56-117673
Expiration Date: April 30, 1987

GENERAL CONDITIONS:

- b. The permittee shall retain 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), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be at least three years from the date of the sample, measurement, report or application unless otherwise specified by department rule.
- c. Records of monitoring information shall include:
 - the date, exact place, and time of sampling or measurements;
 - the person responsible for performing the sampling or measurements;
 - the date(s) analyses were performed;
 - the person responsible for performing the analyses;
 - the analytical techniques or methods used; and
 - the results of such analyses.

15. When requested by the department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the department, such facts or information shall be submitted or corrected promptly.

SPECIFIC CONDITIONS:

1. Maximum through-put rate of wet peel shall not exceed 35 tons per hour.
2. Operating hours shall not exceed 576 per month and 4320 annually.
3. Particulate matter (PM) emissions shall not exceed 30.6 lbs/hr, 8.8 tons per month, and 66.1 TPY, in accordance with FAC Rule 17-2.610(1).
4. Sulfur dioxide (SO₂) emissions shall not exceed 43.8 lbs/hr, 12.6 tons per month, and 94.5 TPY, based on a minimum 70% wet scrubber control system efficiency to remove SO₂.

PERMITTEE:
TreeSweet Products Co., Inc.

Permit Number: AC 56-117673
Expiration Date: April 30, 1987

SPECIFIC CONDITIONS:

5. Visible emissions (VE) shall be limited to "less than 20% opacity" in accordance with FAC Rule 17-2.610(2).

6. Annual compliance tests for PM, SO₂, and VE shall be performed using EPA Methods 5, 6, and 9, respectively, as referenced in FAC Rule 17-2.700 and pursuant to Appendix A, 40 CFR 60. At least 14 days prior notice shall be given the DER's Southeast Florida District. Compliance tests shall be conducted at 100% of the maximum rated throughput of wet peel. Subsequent compliance tests can be performed while the unit is operating at 90-100% of the rated throughput. Any alternate compliance test method shall require approval by the department.

7. In accordance with FAC Rule 17-2.610(3), no person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any source whatsoever, including, but not limited to, 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. Reasonable precautions to be taken may include, but not be limited to the following:

- a. Paving and maintenance of roads, parking areas and yards.
- b. Application of water or chemicals to control emissions from such activities as demolition of buildings, grading roads, construction, and land clearing.
- c. Application of asphalt, water, oil, chemicals or other dust suppressants to unpaved roads, yards, open stock piles and similar sources.
- d. Removal of particulate matter from roads and other paved areas under the control of the owner or operator of the source to prevent reentrainment, and from buildings or work areas to prevent particulate from becoming airborne.
- e. Landscaping or planting or vegetation.
- f. Use of hoods, fans, filters, and similar equipment to contain, capture and/or vent particulate matter.
- g. Confining wet abrasive blasting where possible.
- h. Enclosure or covering of conveyor systems.

8. Objectionable odors shall not be allowed off plant property in accordance with FAC Rule 17-2.620(2).

PERMITTEE:
TreeSweet Products Co., Inc.

Permit Number: AC 56-117673
Expiration Date: April 30, 1987

SPECIFIC CONDITIONS:

9. The source is subject to the provisions of FAC Rule 17-2.250(1),(4),(5), and (6), Excess Emissions. When a report of excess emissions is required, the DER's Southeast Florida District office shall be notified.
10. According to FAC Rule 17-2.240, 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.
11. Maximum new No. 6 fuel oil usage shall not exceed: 360 gallons per hour; 207,360 gallons per month; and $1,555.2 \times 10^3$ gallons per year. Maximum sulfur content shall not exceed 2.5% by weight. Fuel sulfur content shall be analyzed using ASTM Method D-1552 upon request by the department. The permittee shall maintain a copy of the invoice for each delivery describing the volume and percent sulfur content, by weight, for a minimum of two years.
12. Maximum natural gas consumption shall not exceed 40,000 cubic feet per hour, 23.04×10^6 cubic feet per month, and 172.8×10^6 cubic feet per year.
13. No. 2 fuel oil can be used as an emergency, malfunction, and back-up fuel only. The department is to be notified when the unit is operating on this fuel and records shall be maintained on the volume used and time frame in which it was fired. The permittee shall maintain a copy of the invoice for each delivery describing the volume and percent sulfur content, by weight, for a minimum of two years.
14. Fuel flow meters shall be installed on the discharge lines of the fuel oil storage tanks.
15. The permittee shall submit an Annual Operating Report for each calendar year, on forms provided by the department, no later than March 1 of the following calendar year.
16. The construction shall reasonably conform to the plans and schedule submitted in the application. If the permittee is unable to complete construction on schedule, the department must be notified in writing 60 days prior to the expiration of the construction permit and submit a new schedule and request for an extension of the construction permit. (FAC Rule 17-4.09)

PERMITTEE:
TreeSweet Products Co., Inc.

Permit Number: AC 56-117673
Expiration Date: April 30, 1987

SPECIFIC CONDITIONS:

To obtain a permit to operate, the permittee must demonstrate compliance with the conditions of the construction permit and submit a complete application for an operating permit, including the application fee, along with test results and Certificate of Completion, to the DER's Southeast Florida District office 90 days prior to the expiration date of the construction permit. The permittee may continue to operate in compliance with all terms of the construction permit until its expiration date. Operation beyond the construction permit expiration date requires a valid permit to operate. (FAC Rules 17-4.22 and 17-4.23)

If the construction permit expires prior to the permittee requesting an extension or obtaining a permit to operate, then all activities at the project must cease and the permittee must apply for a new permit to construct, which can take up to 90 days to process a complete application. (FAC Rule 17-4.10)

Issued this 17th day of Dec, 1986

STATE OF FLORIDA DEPARTMENT OF
ENVIRONMENTAL REGULATION



VICTORIA J. TSCHINKEL, Secretary

___ pages attached.

Technical Evaluation
and
Preliminary Determination

TreeSweet Products Company, Inc.
St. Lucie County
Ft. Pierce, Florida

Permit Number:
AC 56-117673

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

August 1, 1986

I. Project Description

A. Applicant

TreeSweet Products Company, Inc.
1000 Bell Avenue
Ft. Pierce, Florida 33482

B. Project Description

The applicant proposes to use No. 6 fuel oil (FO) in its existing peel dryer/waste heat evaporator as a primary fuel when it is financially advantageous. The No. 6 FO will have a maximum sulfur content of 2.5% by weight. The existing source is currently firing natural gas as the primary fuel with diesel fuel being used only as a back-up, malfunction, and emergency fuel.

The Standard Industrial Codes for the source are:
Industrial No. 2037 - Frozen Juices, Fruit Juices and Vegetables.
The Source Classification Codes for the source are: Food and Agriculture - Fuel Fired Equipment - Process Heaters:
3-02-900-02 Residual Oil; 3-02-900-03 Natural Gas; 3-02-900-01 Distillate Oil (No. 2).

The UTM coordinates are zone 17, 565.6 km East and 3031.3 km North.

C. Process and Controls

The existing peel dryer/waste heat evaporator are integral units and process 35 tons per hour (TPH) of wet peel. An associated wet scrubber system will be used to control both particulate matter (PM) and sulfur dioxide (SO₂).

II. Rule Applicability

The proposed project is subject to preconstruction review under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code (FAC) Rules 17-2 and 17-4.

The application package was deemed complete on June 2, 1986.

The existing facility is located in St. Lucie County, which is an area designated attainment for all of the criteria pollutants. The existing facility is a minor facility pursuant to FAC Rule 17-2.100(115).

The projected potential pollutant emissions associated with the peel dryer/waste heat evaporator are exhibited in the following table:

Table 1

Source	Potential Pollutant Emissions (TPY)				
	PM	SO ₂	NOx	CO	NMHC
Peel Dryer/Waste Heat Evaporator	66.1	94.5	93.3	3.9	0.2

Note: o Annual hours of operation are 4320.
o Maximum through-put rate is 35 TPH of wet peel
o Maximum No.6 FO consumption is 360 gals/hr.
o PM: emissions are based on Process Weight Table.

SO₂: emissions are based on stoichiometric calculations using as density 8.108 lbs/gal, 2.5% sulfur content by weight, and a scrubber system control efficiency of 70%.

NOx: emissions are based on AP-42 Emission Factors, Table 1.3-1 formula of $lb\ NO_2/10^3\ gals = 22 + 400(N)^2$, where $N = 0.5\%$ by weight.

CO: emissions are based on AP-42 Emission Factors, Table 1.3-1 formula of $55\ lbs/10^3\ gals$.

NMHC: emissions are based on AP-42 Emission Factors, Table 1.3-1 formula of $0.28\ lb/10^3\ gals$.

Based on the table, the proposed project would be a minor modification to a minor facility. Therefore, the proposed project's emissions shall be subject to review pursuant to FAC Rule 17-2.520, Sources Not Subject to Prevention of Significant Deterioration or Nonattainment Requirements.

The source's allowable PM emission limiting and performance standards shall be in accordance with FAC Rules 17-2.610, General Particulate Emission Limiting Standards. The SO₂ allowable emission limiting and performance standards shall be in accordance with what was requested by the applicant and is acceptable by the department, which is placing a minimum scrubber control efficiency for SO₂ at 70%.

In accordance with FAC Rule 17-2.610(1), the source's allowable emissions shall be in accordance with the Process Weight Table, Table 610-1.

The source shall be subject to FAC Rule 17-2.610(2), General Visible Emissions Standard.

The source shall be subject to FAC Rule 17-2.610(3), Unconfined Emissions of Particulate Matter.

According to FAC Rule 17-2.620(2), no person shall cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An objectionable odor is defined 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 according to FAC Rule 17-2.100(130). Therefore, objectionable odors shall not be allowed off plant property.

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 in accordance with FAC Rule 17-2.240, Circumvention.

The source is subject to the provisions of FAC Rule 17-2.250(1), (4), (5), and (6), Excess Emissions.

Testing verification shall be required to demonstrate compliance with the allowable emission limits. For PM, the compliance test method shall be EPA Method 5 in accordance with 40 CFR 60, Appendix A. For SO₂, the compliance test method shall be EPA Method 6 in accordance with 40 CFR 60, Appendix A. For visible emissions (VE), the compliance test method shall be EPA Method 9 in accordance with 40 CFR 60, Appendix A. If any other compliance test method is to be substituted, approval by the department is required.

Fuel sulfur analysis shall be required using ASTM Method D-1552 or other approved method by the department.

An annual operating report will be required and shall be submitted to the DER's Southeast Florida Subdistrict office accounting for the annual consumption of fuels and shall be submitted no later than March 1 of the following calendar year.

III. Summary of Emissions and Air Quality Analysis

A. Emission Limitations

The regulated pollutant emissions from the facility are PM, SO₂, and VE. The following table will reflect the maximum allowable pollutant emissions for the peel dryer/waste heat evaporator:

Table 2

Source	Maximum Allowable Pollutant Emissions					
	PM lbs/hr	TPM	TPY	SO ₂ lbs/hr	TPM	TPY
Peel Dryer/Waste Heat Evaporator	30.6	8.8	66.1	43.8	12.6	94.5
	Visible Emissions		less than 20% opacity			

- Note:
- o TPM - tons per month
 - o Based on 576 hrs/mth and 4320 hrs/yr.
 - o Maximum through-put rate is 35 TPH of wet peel
 - o Assume 70% minimum removal efficiency of SO₂ by the scrubber control system
 - o Maximum No. 6 FO is 360 gals/hr; the No. 6 FO shall be "an oil which has been refined from crude oil and has not been used, and which may or may not contain additives."

The permitted pollutant emissions are in compliance with all applicable requirements of FAC Rules 17-2 and 17-4.

B. Air Quality Analysis

Based on the emissions, an air quality analysis was not required.

IV. Conclusion

Allowing the use of No. 6 FO as a fuel could benefit the company economically. It is noted that the potential NO_x emissions, at the maximum FO consumption and annual hours of operation, are 93.3 TPY and very close to making the source major (based on AP-42 Emission Factors Table 1-3.1 formula). However, the facility is not on the list of Table 500-1 and would require emissions in excess of 250 TPY before being subject to PSD (prevention of significant deterioration) review.

No. 2 FO and natural gas will also be used as fuels for the source, with the No. 2 FO as a back-up, malfunction, and emergency fuel only. The applicant has said that there are existing separate fuel tanks for keeping the fuel oils separate.

The permitted pollutant emissions from the proposed project should not cause any violation of Florida's ambient air quality standards.

The General and Specific Conditions listed in the proposed permit (attached) will assure compliance with all applicable requirements of FAC Rules 17-2 and 17-4.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM
GOVERNOR
VICTORIA J. TSCHINKEL
SECRETARY

August 4, 1986

CERTIFIED MAIL-RETURN RECEIPT REQUESTED


Mr. Bernard W. McBee, Jr.
General Manager
TreeSweet Products Company, Inc.
100 Bell Avenue
Ft. Pierce, Florida 33482

Dear Mr. McBee:

Attached is one copy of the Technical Evaluation and Preliminary Determination, and proposed permit to use No. 6 fuel oil in your existing peel dryer/waste heat evaporator at your facility in Ft. Pierce, St. Lucie County, Florida.

Please submit, in writing, any comments which you wish to have considered concerning the department's proposed action to Mr. Bill Thomas of the Bureau of Air Quality Management.

Sincerely,


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

CHF/pa

Attachments

cc: Wayne E. Griffin, P.E.
Tim Powell

State of Florida
Department of Environmental Regulation
Notice of Intent

The Department gives notice of its intent to issue a permit to TreeSweet Products Company, Inc. to use No. 6 fuel oil in its existing peel dryer/waste heat evaporator. An associated wet scrubber system will be used to control both particulate matter and sulfur dioxide emission. The proposed project will be located at the TreeSweet Products Company's existing facility in Ft. Pierce, St. Lucie County, Florida. A determination of best available control technology (BACT) was not required.

Persons whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative determination (hearing) in accordance with Section 120.57, Florida Statutes. The petition must conform to the requirements of Chapters 17-103 and 28-5, Florida Administrative Code, and must be filed (received) in the Department's Office of General Counsel, 2600 Blair Stone Road, Twin Towers Office Building, Tallahassee, Florida 32301, within fourteen (14) days of publication of this notice. Failure to file a petition within this time period constitutes a waiver of any right such person has to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the proposed agency action. Therefore, persons who may not wish to file a petition may wish to intervene in the proceeding. A petition for intervention must be filed pursuant to Rule 28-5.207, Florida Administrative Code, at least five (5) days before the final hearing and be filed with the hearing officer if one has been assigned at the Division of Administrative Hearings, Department of Administration, 2009, Apalachee Parkway, Tallahassee, Florida 32301. If no hearing officer has been assigned, the petition is to be filed with the Department's Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32301. Failure to petition to intervene within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, Florida Statutes.

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

Dept. of Environmental Regulation
Bureau of Air Quality Management
2600 Blair Stone Road
Tallahassee, Florida 32301

Dept. of Environmental Regulation
Southeast Florida Subdistrict
2745 Southeast Morningside Blvd.
Port St. Lucie, Florida 33452

Any person may send written comments on the proposed action to Mr. Bill Thomas at the department's Tallahassee address. All comments mailed within ~~30~~ days of the publication of this notice will be considered in the department's final determination.

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expressed to Wayne Brittin by phone on 10/27/86
RFM

@ 2:41 PM

BEFORE THE STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

In the Matter of
Application for Permit by:

TreeSweet Products Company, Inc.
1000 Bell Avenue
Ft. Pierce, Florida 33482

DER File No. AC 56-117673

INTENT TO ISSUE

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

The applicant, Treesweet Products Company, Inc., applied on March 17, 1986, to the Department of Environmental Regulation for a permit to use No. 6 fuel oil in its existing peel dryer/waste heat evaporator at the applicant's existing facility in Ft. Pierce, St. Lucie County, Florida.

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


Pursuant to Section 403.815, F.S. and DER Rule 17-103.150, FAC, you (the applicant) are required to publish at your own expense the enclosed Notice of Proposed Agency Action on permit application. The notice must be published one time only in a section of a major local newspaper of general circulation in the county in which the project is located and within thirty (30) days from receipt of this intent. Proof of publication must be provided to the Department within seven days of publication of

the notice. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit.

The Department will issue the permit with the attached conditions unless petition for an administrative proceeding (hearing) is filed pursuant to the provisions of Section 120.57, F.S. A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. Petitions must comply with the requirement of Florida Administrative Code Rules 17-103.155 and 28-5.201 (copies enclosed) and be filed with (received by) the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32301-8241. Petitions filed by the permit applicant must be filed within fourteen (14) days of receipt of this intent. Petitions filed by other persons must be filed within fourteen (14) days of publication of the public notice or within fourteen (14) days of receipt of this intent, whichever first occurs. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes, concerning the subject permit application. Petitions which are not filed in accordance with the above provisions will be dismissed.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION



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

Copies furnished to:

Bernard W. McBee, Jr.
Wayne E. Griffin, P.E.
Tim Powell

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this NOTICE OF INTENT TO ISSUE and all copies were mailed before the close of business on August 4, 1986.

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

Patricia G. Adams Aug. 4, 1986
Clerk Date

RULES OF THE ADMINISTRATIVE COMMISSION
MODEL RULES OF PROCEDURE
CHAPTER 28-5
DECISIONS DETERMINING SUBSTANTIAL INTERESTS

28-5.15 Requests for Formal and Informal Proceedings

- (1) Requests for proceedings shall be made by petition to the agency involved. Each petition shall be printed typewritten or otherwise duplicated in legible form on white paper of standard legal size. Unless printed, the impression shall be on one side of the paper only and lines shall be double spaced and indented.
- (2) All petitions filed under these rules should contain:
 - (a) The name and address of each agency affected and each agency's file or identification number, if known;
 - (b) The name and address of the petitioner or petitioners;
 - (c) All disputed issues of material fact. If there are none, the petition must so indicate;
 - (d) A concise statement of the ultimate facts alleged, and the rules, regulations and constitutional provisions which entitle the petitioner to relief;
 - (e) A statement summarizing any informal action taken to resolve the issues, and the results of that action;
 - (f) A demand for the relief to which the petitioner deems himself entitled; and
 - (g) Such other information which the petitioner contends is material.

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of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32301. Failure to petition to intervene within the allowed time frame constitutes a waiver of any right such person has to an administrative determination (hearing) under Section 120.57, F.S.

(4) Notice to substantially affected persons concerning applications for Department permits is an essential and integral part of the state environmental licensing process. Therefore, no application for a permit for which publication of notice is required shall be granted until and unless proof of publication of Notice is furnished to the appropriate Department permitting office.

(5)(a) Any applicant or person benefiting from the Department's action may elect to publish notice of proposed agency action in the manner provided by subsection (2) or (3). Any person who elects to publish notice of proposed agency action, upon presentation of proof of publication to the Department, prior to final agency action, shall be entitled to the same benefits under this rule as a person who is required to publish notice of proposed agency action. Since persons whose substantial interests are affected by a Department decision on a permit application may petition for an administrative proceeding within fourteen (14) days after receipt of notice and since, unless notice is given or published as prescribed in this rule, receipt of notice can occur at any time, the applicant or persons benefiting from the Department's action cannot justifiably rely on the finality of

the Department's decision without the notice having been duly given or published.

(b) The notices required by this rule may be combined with other notices required by the Department pursuant to Chapter 403, 376, or 253, F.S., or Chapter 17, FAC.

(c) The provisions of this section shall also apply to the permitting of hazardous waste facilities, but only to the extent it is consistent with Chapter 17-30, Part IV, FAC. Whenever Chapter 17-30, Part IV, FAC, provides for a different time or notice procedure than that set forth in this section the time and notice provisions of Chapter 17-30 shall govern.

(6) Failure to publish any notice of application, notice of proposed agency action, or notice of agency action required by the Department shall be an independent basis for the denial of a permit.

Specific Authority: 120.53,
403.0876, 403.815, F.S. Law
Implemented: 120.53, F.S.
History: New 9-20-79, Amended
4-28-81, Transferred from 17-1.62
and Amended 6-1-84.

17-103.155 Petition for Administrative Hearing; Waiver of Right to Administrative Proceeding.

(1)(a) Any person whose substantial interests may be affected by proposed or final agency action may file a petition for administrative proceeding. A petition shall be in the form required by this Chapter and Chapter 28-5, FAC, and shall be filed (received) in the Office of General Counsel of the Department within fourteen (14) days of receipt of notice of proposed agency action or within fourteen (14) days of receipt of notice of

17-103.150(3)(d) -- 17-103.155(1)(a)

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agency action whenever there is no public notice of proposed agency action. In addition to the requirements of Rule 28-5.201, FAC, the Petition must specify the county in which the project is or will be located.

(b) Failure to file a petition within fourteen (14) days of receipt of notice of agency action or fourteen (14) days of receipt of notice of proposed agency action, whichever notice first occurs, shall constitute a waiver of any right to request an administrative proceeding under Chapter 120, F.S.

(c) When there has been no publication of notice of agency action or notice of proposed agency action as prescribed in Rule 17-103.150, FAC, a person who has actual knowledge of the agency action or has knowledge which would lead a reasonable person to conclude that the Department has taken final agency action, has a duty to make further inquiry within fourteen (14) days of obtaining such knowledge by contacting the Department to ascertain whether the action has occurred. The Department shall upon receipt of such an inquiry, if agency action has occurred, promptly provide the person with notice as prescribed by Rule 17-103.150, FAC. Failure of the person to make inquiry with the Department within fourteen (14) days after obtaining such knowledge may estop the person from obtaining an administrative proceeding on the agency action.

(2)(a) "Receipt of notice of agency action" means receipt of written notice of final agency action, as prescribed by Department rule, or the publication, pursuant to Department rule, of notice of final agency action, whichever first

occurs.

(b) "Receipt of notice of proposed agency action" means receipt of written notice (such as a letter of intent) that the Department proposes to take certain action, or the publication pursuant to Department rule of notice of proposed agency action, whichever first occurs.

(3) Notwithstanding any other provision in this Chapter, should a substantially affected person who fails to timely request a hearing under Section 120.57, F.S., administratively appeal the final Department action or order, the record on appeal should be limited to:

(a) the application, and accompanying documentation submitted by the applicant prior to the issuance of the agency's intent to issue or deny the requested permit.

(b) the materials and information relied upon by the agency in determining the final agency action or order;

(c) any notices issued or published; and

(d) the final agency action or order entered concerning the permit application.

(4) In such cases where persons do not timely exercise their rights accorded by Section 120.57(1), Florida Statutes, the allegations of fact contained in or incorporated by the final agency action shall be deemed uncontested and true, and appellants may not dispute the truth of such allegations upon subsequent appeal.

(5) Any applicant may challenge the Department's request for additional information by filing with the Office of General Counsel an appropriate petition for administrative proceeding pursuant to Section 120.60, F.S., following receipt by

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the applicant of the Department's notification, pursuant to Section 403.0876, F.S., that additional information is required.

Specific Authority: 120.53, 403.0876, 403.815, F.S. Law Implemented: 120.53, F.S. History: New 9-20-79, Amended 4-28-81, Transferred from 17-1.62 and Amended 6-1-84.

17-103.160 Uniformity In Approval and Denial of Applications for Department Permits and Certifications. To the extent possible and consistent with the public interest, the Department approves and denies applications for permits and certifications on a uniform and consistent basis. Final Department actions on applications for permits and certifications shall be consistent with prior Department actions, unless deviation therefrom is explained by the Department in writing or the hearing officer who submits a recommended order to the Department for final agency action in accordance with Section 120.57, Florida Statutes.

Specific Authority: 120.53(1), F.S. Law Implemented: 120.53(1), 120.68(12), F.S. History: New 2-6-78, Transferred from 17-1.63, 6-1-84.

17-103.170 Designation, Preparation and Transmittal of Record for Administrative Appeals.

When any Department action or order is the subject of an administrative appeal under Chapter 17-103, Part II, FAC, the following requirements shall apply:

(1) Designation of Record. Within fifteen (15) days of rendition of the Department's final order, the appellant shall designate

to the Department, in writing, with copies to other parties, those documents or things under the control of or in the possession of the Department which the appellant desires to have included in the record, and which were received or considered in the Department proceeding below. If a proceeding was reported by mechanical recording devices, the appellant shall designate those portions of the proceeding for which it requires written transcription or tapes for transcription. Any other party may designate other portions of the record in the manner provided herein. Such cross-designation shall be filed with the Department, with copies provided other parties, within seven (7) days after receipt of the designation by the appellant.

(2) Original Record. The Department shall thereupon include in the record all of the designated portions of the original papers and exhibits in the proceedings or matter from which administrative appeal is taken, together with a copy of any such parts of the proceedings as were stenographically reported or transcribed from tapes, and as have been designated by the parties and certified by a notary public, the reporter, or other officer for inclusion in the record on appeal or review, and certified copies of the order, if any, of which review is sought. The Department may, at its discretion, substitute certified copies for original papers or documents in its possession.

(3) Preparation of Record. Upon tender or deposit by appellant of the estimated cost of preparation, the Department shall prepare the record in accordance with the designations of the parties. The cost of preparation, and reproduction,

Technical Evaluation
and
Preliminary Determination

TreeSweet Products Company, Inc.
St. Lucie County
Ft. Pierce, Florida

Permit Number:
AC 56-117673

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

August 1, 1986

I. Project Description

A. Applicant

TreeSweet Products Company, Inc.
1000 Bell Avenue
Ft. Pierce, Florida 33482

B. Project Description

The applicant proposes to use No. 6 fuel oil (FO) in its existing peel dryer/waste heat evaporator as a primary fuel when it is financially advantageous. The No. 6 FO will have a maximum sulfur content of 2.5% by weight. The existing source is currently firing natural gas as the primary fuel with diesel fuel being used only as a back-up, malfunction, and emergency fuel.

The Standard Industrial Codes for the source are:
Industrial No. 2037 - Frozen Juices, Fruit Juices and Vegetables.
The Source Classification Codes for the source are: Food and Agriculture - Fuel Fired Equipment - Process Heaters:
3-02-900-02 Residual Oil; 3-02-900-03 Natural Gas; 3-02-900-01 Distillate Oil (No. 2).

The UTM coordinates are zone 17, 565.6 km East and 3031.3 km North.

C. Process and Controls

The existing peel dryer/waste heat evaporator are integral units and process 35 tons per hour (TPH) of wet peel. An associated wet scrubber system will be used to control both particulate matter (PM) and sulfur dioxide (SO₂).

II. Rule Applicability

The proposed project is subject to preconstruction review under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code (FAC) Rules 17-2 and 17-4.

The application package was deemed complete on June 2, 1986.

The existing facility is located in St. Lucie County, which is an area designated attainment for all of the criteria pollutants. The existing facility is a minor facility pursuant to FAC Rule 17-2.100(115).

The projected potential pollutant emissions associated with the peel dryer/waste heat evaporator are exhibited in the following table:

Table 1

Source	Potential Pollutant Emissions (TPY)				
	PM	SO ₂	NOx	CO	NMHC
Peel Dryer/Waste Heat Evaporator	66.1	94.5	93.3	3.9	0.2

- Note:
- o Annual hours of operation are 4320.
 - o Maximum through-put rate is 35 TPH of wet peel
 - o Maximum No.6 FO consumption is 360 gals/hr.
 - o PM: emissions are based on Process Weight Table.

SO₂: emissions are based on stoichiometric calculations using as density 8.108 lbs/gal, 2.5% sulfur content by weight, and a scrubber system control efficiency of 70%.

NOx: emissions are based on AP-42 Emission Factors, Table 1.3-1 formula of $1b\ NO_2/10^3\ gals = 22 + 400(N)^2$, where $N = 0.5\%$ by weight.

CO: emissions are based on AP-42 Emission Factors, Table 1.3-1 formula of $55\ lbs/10^3\ gals$.

NMHC: emissions are based on AP-42 Emission Factors, Table 1.3-1 formula of $0.28\ lb/10^3\ gals$.

Based on the table, the proposed project would be a minor modification to a minor facility. Therefore, the proposed project's emissions shall be subject to review pursuant to FAC Rule 17-2.520, Sources Not Subject to Prevention of Significant Deterioration or Nonattainment Requirements.

The source's allowable PM emission limiting and performance standards shall be in accordance with FAC Rules 17-2.610, General Particulate Emission Limiting Standards. The SO₂ allowable emission limiting and performance standards shall be in accordance with what was requested by the applicant and is acceptable by the department, which is placing a minimum scrubber control efficiency for SO₂ at 70%.

In accordance with FAC Rule 17-2.610(1), the source's allowable emissions shall be in accordance with the Process Weight Table, Table 610-1.

The source shall be subject to FAC Rule 17-2.610(2), General Visible Emissions Standard.

The source shall be subject to FAC Rule 17-2.610(3), Unconfined Emissions of Particulate Matter.

According to FAC Rule 17-2.620(2), no person shall cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An objectionable odor is defined 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 according to FAC Rule 17-2.100(130). Therefore, objectionable odors shall not be allowed off plant property.

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 in accordance with FAC Rule 17-2.240, Circumvention.

The source is subject to the provisions of FAC Rule 17-2.250(1), (4), (5), and (6), Excess Emissions.

Testing verification shall be required to demonstrate compliance with the allowable emission limits. For PM, the compliance test method shall be EPA Method 5 in accordance with 40 CFR 60, Appendix A. For SO₂, the compliance test method shall be EPA Method 6 in accordance with 40 CFR 60, Appendix A. For visible emissions (VE), the compliance test method shall be EPA Method 9 in accordance with 40 CFR 60, Appendix A. If any other compliance test method is to be substituted, approval by the department is required.

Fuel sulfur analysis shall be required using ASTM Method D-1552 or other approved method by the department.

An annual operating report will be required and shall be submitted to the DER's Southeast Florida Subdistrict office accounting for the annual consumption of fuels and shall be submitted no later than March 1 of the following calendar year.

III. Summary of Emissions and Air Quality Analysis

A. Emission Limitations

The regulated pollutant emissions from the facility are PM, SO₂, and VE. The following table will reflect the maximum allowable pollutant emissions for the peel dryer/waste heat evaporator:

Table 2

Source	Maximum Allowable Pollutant Emissions					
	PM lbs/hr	TPM	TPY	SO ₂ lbs/hr	TPM	TPY
Peel Dryer/Waste Heat Evaporator	30.6	8.8	66.1	43.8	12.6	94.5
	Visible Emissions			less than 20% opacity		

- Note:
- o TPM - tons per month
 - o Based on 576 hrs/mth and 4320 hrs/yr.
 - o Maximum through-put rate is 35 TPH of wet peel
 - o Assume 70% minimum removal efficiency of SO₂ by the scrubber control system
 - o Maximum No. 6 FO is 360 gals/hr; the No. 6 FO shall be "an oil which has been refined from crude oil and has not been used, and which may or may not contain additives."

The permitted pollutant emissions are in compliance with all applicable requirements of FAC Rules 17-2 and 17-4.

B. Air Quality Analysis

Based on the emissions, an air quality analysis was not required.

IV. Conclusion

Allowing the use of No. 6 FO as a fuel could benefit the company economically. It is noted that the potential NO_x emissions, at the maximum FO consumption and annual hours of operation, are 93.3 TPY and very close to making the source major (based on AP-42 Emission Factors Table 1-3.1 formula). However, the facility is not on the list of Table 500-1 and would require emissions in excess of 250 TPY before being subject to PSD (prevention of significant deterioration) review.

No. 2 FO and natural gas will also be used as fuels for the source, with the No. 2 FO as a back-up, malfunction, and emergency fuel only. The applicant has said that there are existing separate fuel tanks for keeping the fuel oils separate.

The permitted pollutant emissions from the proposed project should not cause any violation of Florida's ambient air quality standards.

The General and Specific Conditions listed in the proposed permit (attached) will assure compliance with all applicable requirements of FAC Rules 17-2 and 17-4.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

PERMITTEE:
TreeSweet Products Co., Inc.
P. O. Box 189
1000 Bell Avenue
Ft. Pierce, Florida 33454

Permit Number: AC 56-117673
Expiration Date: April 30, 1987
County: St. Lucie
Latitude/Longitude: 27° 24' 11"N
80° 20' 24"W
Project: Peel Dryer/Waste Heat
Evaporator with an Associated
Wet Scrubber Control System

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

For the modification to an existing source to fire new No. 6 fuel oil and natural gas as primary fuels and No. 2 fuel oil as a back-up, malfunction, and emergency fuel only. "New" means an oil which has been refined from crude oil and has not been used, and which may or may not contain additives. Maximum sulfur content for the No. 6 fuel oil shall not exceed 2.5% by weight.

The peel dryer/waste heat evaporator processes a maximum of 35 tons/hour of wet peel and is rated at 40 MMBtu/hr heat input. A wet scrubber system is used to control pollutant emissions.

The Standard Industrial Codes are: Industrial No. 2037-Frozen Juices, Fruit Juices and Vegetables. The Source Classification Codes are: Food and Agriculture-Fuel Fired Equipment-Process Heaters: 3-02-900-02 Residual Oil; 3-02-900-03 Natural Gas; and, 3-02-900-01 Distillate Oil (No. 2).

The UTM coordinates are Zone 17, 565.6 km East and 3031.3 km North.

The source shall be as reflected in the permit application, plans, documents, drawings, and amendments, except as otherwise noted on pages 5-8 of the Specific Conditions.

Attachments;

1. Application to Construct/Modify Air Pollution Sources, DER Form 17-2.202(1), received by DER's Southeast Florida Subdistrict office on March 17, 1986.
2. Mr. Tim Powell's letter dated March 19, 1986.
3. Mr. C. H. Fancy's letter dated April 15, 1986.
4. Mr. John Fredrick Lang's letter with attachment, May 26, 1986.
5. Mr. Wayne E. Griffin's letter with enclosures, May 29, 1986, and received June 2, 1986.

PERMITTEE:
TreeSweet Products Co., Inc.

Permit Number: AC 56-117673
Expiration Date: April 30, 1987

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and as such are binding upon the permittee and enforceable pursuant to the authority of Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is hereby placed on notice that the department will review this permit periodically and may initiate enforcement action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.

2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the department.

3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor 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 does not constitute a waiver of or approval of any other department permit that may be required for other aspects of the total project which are not addressed in the permit.

4. This permit conveys no title to land or water, does not constitute state recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the state. Only the Trustees of the Internal Improvement Trust Fund may express state opinion as to title.

5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, plant or aquatic life or property and penalties therefore caused by the construction or operation of this permitted source, nor does it allow the permittee to cause pollution in contravention of Florida Statutes and department rules, unless specifically authorized by an order from the department.

PERMITTEE: Permit Number: AC 56-117673
TreeSweet Products Co., Inc. Expiration Date: April 30, 1987

GENERAL CONDITIONS:

6. The permittee shall at all times properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized department personnel, upon presentation of credentials or other documents as may be required by law, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purpose of:

- a. Having access to and copying any records that must be kept under the conditions of the permit;
- b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sampling or monitoring any substances or parameters at any location reasonably necessary to assure compliance with this permit or department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately notify and provide the department with the following information:

- a. a description of and cause of non-compliance; and
- b. the period of noncompliance, including exact dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance.

PERMITTEE:
TreeSweet Products Co., Inc.

Permit Number: AC 56-117673
Expiration Date: April 30, 1987

GENERAL CONDITIONS:

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

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source, which are submitted to the department, may be used by the department as evidence in any enforcement case arising under the Florida Statutes or department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes.

10. The permittee agrees to comply with changes in department rules and Florida Statutes after a reasonable time for compliance, provided however, the permittee does not waive any other rights granted by Florida Statutes or department rules.

11. This permit is transferable only upon department approval in accordance with Florida Administrative Code Rules 17-4.12 and 17-30.30, as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the department.

12. This permit is required to be kept at the work site of the permitted activity during the entire period of construction or operation.

13. This permit also constitutes:

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

14. The permittee shall comply with the following monitoring and record keeping requirements:

- a. Upon request, the permittee shall furnish all records and plans required under department rules. The retention period for all records will be extended automatically, unless otherwise stipulated by the department, during the course of any unresolved enforcement action.

PERMITTEE: Permit Number: AC 56-117673
TreeSweet Products Co., Inc. Expiration Date: April 30, 1987

GENERAL CONDITIONS:

- b. The permittee shall retain 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), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be at least three years from the date of the sample, measurement, report or application unless otherwise specified by department rule.
- c. Records of monitoring information shall include:
 - the date, exact place, and time of sampling or measurements;
 - the person responsible for performing the sampling or measurements;
 - the date(s) analyses were performed;
 - the person responsible for performing the analyses;
 - the analytical techniques or methods used; and
 - the results of such analyses.

15. When requested by the department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the department, such facts or information shall be submitted or corrected promptly.

SPECIFIC CONDITIONS:

1. Maximum through-put rate of wet peel shall not exceed 35 tons per hour.
2. Operating hours shall not exceed 576 per month and 4320 annually.
3. Particulate matter (PM) emissions shall not exceed 30.6 lbs/hr, 8.8 tons per month, and 66.1 TPY, in accordance with FAC Rule 17-2.610(1).
4. Sulfur dioxide (SO₂) emissions shall not exceed 43.8 lbs/hr, 12.6 tons per month, and 94.5 TPY, based on a minimum 70% wet scrubber control system efficiency to remove SO₂.

PERMITTEE: Permit Number: AC 56-117673
TreeSweet Products Co., Inc. Expiration Date: April 30, 1987

SPECIFIC CONDITIONS:

5. Visible emissions (VE) shall be limited to "less than 20% opacity" in accordance with FAC Rule 17-2.610(2).

6. Annual compliance tests for PM, SO₂, and VE shall be performed using EPA Methods 5, 6, and 9, respectively, as referenced in FAC Rule 17-2.700 and pursuant to Appendix A, 40 CFR 60. At least 14 days prior notice shall be given the DER's SE Florida Subdistrict. Compliance tests shall be conducted at 100% of the maximum rated throughput of wet peel. Subsequent compliance tests can be performed while the unit is operating at 90-100% of the rated throughput. Any alternate compliance test method shall require approval by the department.

7. In accordance with FAC Rule 17-2.610(3), no person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any source whatsoever, including, but not limited to, 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. Reasonable precautions to be taken may include, but not be limited to the following:

- a. Paving and maintenance of roads, parking areas and yards.
- b. Application of water or chemicals to control emissions from such activities as demolition of buildings, grading roads, construction, and land clearing.
- c. Application of asphalt, water, oil, chemicals or other dust suppressants to unpaved roads, yards, open stock piles and similar sources.
- d. Removal of particulate matter from roads and other paved areas under the control of the owner or operator of the source to prevent reentrainment, and from buildings or work areas to prevent particulate from becoming airborne.
- e. Landscaping or planting or vegetation.
- f. Use of hoods, fans, filters, and similar equipment to contain, capture and/or vent particulate matter.
- g. Confining wet abrasive blasting where possible.
- h. Enclosure or covering of conveyor systems.

8. Objectionable odors shall not be allowed off plant property in accordance with FAC Rule 17-2.620(2).

PERMITTEE:
TreeSweet Products Co., Inc.

Permit Number: AC 56-117673
Expiration Date: April 30, 1987

SPECIFIC CONDITIONS:

9. The source is subject to the provisions of FAC Rule 17-2.250(1),(4),(5), and (6), Excess Emissions. When a report of excess emissions is required, the DER's Southeast Florida Subdistrict office shall be notified.
10. According to FAC Rule 17-2.240, 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.
11. Maximum new No. 6 fuel oil usage shall not exceed: 360 gallons per hour; 207,360 gallons per month; and $1,555.2 \times 10^3$ gallons per year. Maximum sulfur content shall not exceed 2.5% by weight. Fuel sulfur content shall be analyzed using ASTM Method D-1552 upon request by the department. The permittee shall maintain a copy of the invoice for each delivery describing the volume and percent sulfur content, by weight, for a minimum of two years.
12. Maximum natural gas consumption shall not exceed 40,000 cubic feet per hour, 23.04×10^6 cubic feet per month, and 172.8×10^6 cubic feet per year.
13. No. 2 fuel oil can be used as an emergency, malfunction, and back-up fuel only. The department is to be notified when the unit is operating on this fuel and records shall be maintained on the volume used and time frame in which it was fired. The permittee shall maintain a copy of the invoice for each delivery describing the volume and percent sulfur content, by weight, for a minimum of two years.
14. Fuel flow meters shall be installed on the discharge lines of the fuel oil storage tanks.
15. The permittee shall submit an Annual Operating Report for each calendar year, on forms provided by the department, no later than March 1 of the following calendar year.
16. The construction shall reasonably conform to the plans and schedule submitted in the application. If the permittee is unable to complete construction on schedule, the department must be notified in writing 60 days prior to the expiration of the construction permit and submit a new schedule and request for an extension of the construction permit. (FAC Rule 17-4.09)

PERMITTEE:
TreeSweet Products Co., Inc.

Permit Number: AC 56-117673
Expiration Date: April 30, 1987

SPECIFIC CONDITIONS:

To obtain a permit to operate, the permittee must demonstrate compliance with the conditions of the construction permit and submit a complete application for an operating permit, including the application fee, along with test results and Certificate of Completion, to the DER's Southeast Florida Subdistrict office 90 days prior to the expiration date of the construction permit. The permittee may continue to operate in compliance with all terms of the construction permit until its expiration date. Operation beyond the construction permit expiration date requires a valid permit to operate. (FAC Rules 17-4.22 and 17-4.23)

If the construction permit expires prior to the permittee requesting an extension or obtaining a permit to operate, then all activities at the project must cease and the permittee must apply for a new permit to construct, which can take up to 90 days to process a complete application. (FAC Rule 17-4.10)

Issued this ____ day of _____, 19__

STATE OF FLORIDA DEPARTMENT OF
ENVIRONMENTAL REGULATION

VICTORIA J. TSCHINKEL, Secretary

____ pages attached.

ATTACHMENT 1

DEPARTMENT OF ENVIRONMENTAL REGULATION

AC 56-117673

RECEIVED

MAR 17 1986

SOUTHEAST FLORIDA
SUBDISTRICT

2745 SOUTHEAST MORNINGSIDE BOULEVARD
PORT ST. LUCIE, FLORIDA 33452



BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

AL MUELLER
SUBDISTRICT MANAGER

Dept. Port St. Lucie

APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: Citrus Pulp Dehydrator System [] New¹ [x] Existing¹

APPLICATION TYPE: [] Construction [] Operation [x] Modification

COMPANY NAME: TREESWEET PRODUCTS COMPANY, INC. COUNTY: ST. LUCIE

Identify the specific emission point source(s) addressed in this application (i.e. Lime waste heat evaporator and scrubber, peel dryer)
Kiln No. 4 with Venturi Scrubber; Peaking Unit No. 2, Gas Fired)

SOURCE LOCATION: Street 1000 Bell Avenue City Ft. Pierce

UTM: East 714,120' North 1,114,050'

Latitude 27 ° 24 ' 11 "N Longitude 80 ° 20 ' 24 "W

APPLICANT NAME AND TITLE: Bernard W. McBee, Jr. General Manager

APPLICANT ADDRESS: 1000 Bell Avenue, Ft. Pierce, Florida 33482

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

I am the undersigned owner or authorized representative* of TreeSweet Products Co., Inc.

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

*Attach letter of authorization

Signed: Bernard W. McBee, Jr.

Bernard W. McBee, Jr. General Manager
Name and Title (Please Type)

Date: 3/10/86 Telephone No. (305) 461-3800

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

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

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

Cont. ... # P 213 101 073

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

Signed Wayne E. Griffin
Wayne E. Griffin
Name (Please Type)

GulfCoast Engineering, Inc.
Company Name (Please Type)

913 S. Parsons Avenue-Suite A, Brandon, Florida 33511
Mailing Address (Please Type)

Florida Registration No. 19974 Date: 3/12/86 Telephone No. (813)685-9727

SECTION II: GENERAL PROJECT INFORMATION

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

TreeSweet desires to use #6 fuel oil as the primary fuel when it is financially advantageous utilizing existing equipment.

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

Start of Construction _____ Completion of Construction _____

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

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

Current permit #A0-56-64438 expires 3/29/88

4320
576 hrs/month
7.5 mths

E. Requested permitted equipment operating time: hrs/day 24 ; days/wk 6 ; wks/yr 30 ;
if power plant, hrs/yr _____; if seasonal, describe: Operates during fruit
processing season; normally December through July.

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

- 1. Is this source in a non-attainment area for a particular pollutant? _____
 - a. If yes, has "offset" been applied? _____
 - b. If yes, has "Lowest Achievable Emission Rate" been applied? _____
 - c. If yes, list non-attainment pollutants. _____

2. Does best available control technology (BACT) apply to this source?
If yes, see Section VI. _____

3. Does the State "Prevention of Significant Deterioration" (PSD)
requirement apply to this source? If yes, see Sections VI and VII. _____

4. Do "Standards of Performance for New Stationary Sources" (NSPS)
apply to this source? _____

5. Do "National Emission Standards for Hazardous Air Pollutants"
(NESHAP) apply to this source? _____

H. Do "Reasonably Available Control Technology" (RACT) requirements apply
to this source? _____

- a. If yes, for what pollutants? _____
- b. If yes, in addition to the information required in this form,
any information requested in Rule 17-2.650 must be submitted.

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

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

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

Description	Contaminants		Utilization Rate - lbs/hr	Relate to Flow Diagram
	Type	% Wt		
Wet Citrus Peel	Particulate	±1%	81,000#/Hr.	in feed to feed mill
Dry Lime	-	0	100#/Hr.	Added to Citrus Peel
Plant Waste Water and spent caustic	-	0	9,000#/Hr.	to evaporator feed tank #2

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

- Total Process Input Rate (lbs/hr): 90,100
- Product Weight (lbs/hr): Approximately 18,000#/Hr. feed @ 10% moisture

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

Name of Contaminant	Emission ¹		Allowed ² Emission Rate per Rule 17-2	Allowable ³ Emission lbs/hr	Potential ⁴ Emission		Relate to Flow Diagram
	Maximum lbs/hr	Actual T/yr			lbs/yr	T/yr	
Particulates	3.38#/Hr.	4.1	17-2.600(10)	20% opacity	1.97x10 ⁶	984	-
Sulfur Dioxide	*	*	& 17-2.610	31.3#/Hr.	3.4x10 ⁵	169	-
Carbon Monoxide	*	*			4320	2.2	-
Hydrocarbons	*	*			864	.4	-
Nitrogen Oxides	*	*			1.04x10 ⁵	51.8	-

¹See Section V, Item 2.

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

³Calculated from operating rate and applicable standard.

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

* Actual emission are unknown; to be tested

** Based on 2400 Hrs. of operation without wet scrubber control.

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

Name and Type (Model & Serial No.)	Contaminant	Efficiency	Range of Particles Size Collected (in microns) (If applicable)	Basis for Efficiency (Section V Item 5)
Wet Scrubber	Particulate	99±%	Particules of 1mm and under @ 140° F.	

E. Fuels

Type (Be Specific)	Consumption*		Maximum Heat Input (MMBTU/hr)
	avg/hr	max./hr	
Natural Gas	4 x 10 ⁴ cf/Hr.	4.8 x 10 ⁴ cf/Hr.	48
#6 Oil	240 gal/Hr.	360 gal/Hr.	54.7

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

Fuel Analysis: No.6

Percent Sulfur: 2.5 Percent Ash: .05
 Density: 9.0 @ 60°F NOPE Tech. Bulletin No. 68-101, Appendix C
9.108 @ 60°F lbs/gal Typical Percent Nitrogen: 0.5
 Heat Capacity: _____ BTU/lb 152,000 BTU/gal

Other Fuel Contaminants (which may cause air pollution): _____

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

Annual Average 0 Maximum 0

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

Solids become animal feed. Liquids are utilized in cooling, scrubbing,
washdowns and evaporator cleanups ultimately disposed of in plant wastewater
system.

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

Stack Height: _____ ft. Stack Diameter: _____ ft.

Gas Flow Rate: _____ ACFM _____ DSCFM Gas Exit Temperature: _____ °F.

Water Vapor Content: _____ % Velocity: _____ FPS

SECTION IV: INCINERATOR INFORMATION

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

Description of Waste _____

Total Weight Incinerated (lbs/hr) _____ Design Capacity (lbs/hr) _____

Approximate Number of Hours of Operation per day _____ day/wk _____ wks/yr. _____

Manufacturer: _____

Date Constructed _____ Model No. _____

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

Stack Height: _____ ft. Stack Diameter: _____ Stack Temp. _____

Gas Flow Rate: _____ ACFM _____ DSCFM* Velocity: _____ FPS

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

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

**GULF COAST ENGINEERING COMPANY
CONSULTING ENGINEERS**

P.O. BOX 1786 • BRANDON, FLORIDA 33511
TELEPHONE: (813) 685-8727 • 685-0085

Job no. _____
 description Tree Sweet Products computed by WT date 3-11-86
 sheet 1 of 1 checked by _____ date _____

Waste Heat Evaporator

Uncontrolled emissions

#6 {	Process Particulates - ±1% =	8,100 #/hr × 1% =	810 #/hr
	Fuel Particulates - 28 #/10 ³ gal =	28 × 360 gph ÷ 1000 =	10.1 #/hr
	Sulfur Dioxide - 393 #/10 ³ gal =	393 × 360 gph ÷ 1000 =	141 #/hr
	Carbon Monoxide - 5 #/10 ³ gal =	5 × 360 gph ÷ 1000 =	1.8 #/hr
	Hydrocarbons - 1 #/10 ³ gal =	1 × 360 gph ÷ 1000 =	0.36 #/hr
	Nitrogen Oxides - 120 #/10 ³ gal =	120 × 360 gph ÷ 1000 =	43.2 #/hr

Controlled emissions (per test)

Process Particulates = 30.85 rms/hr × 1% particulates = 617 #/hr
 potential uncontrolled emissions = 617 + 10.1 = 627.1 #/hr
 Actual emissions = 3.38 #/hr

Particulate % removal = 99.46%

Controlled emissions for sulfur dioxide, carbon monoxide, hydrocarbons, & nitrogen oxides are unknown. It is anticipated the emission levels of these parameters will be significantly less than the uncontrolled emissions.

Annual emission levels based on 2400 hrs of operation

Brief description of operating characteristics of control devices: _____

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

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

SECTION V: SUPPLEMENTAL REQUIREMENTS

Please provide the following supplements where required for this application.

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

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

SECTION VI: BEST AVAILABLE CONTROL TECHNOLOGY

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

Yes No

Contaminant	Rate or Concentration

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

Yes No

Contaminant	Rate or Concentration

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

Contaminant	Rate or Concentration

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

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

*Explain method of determining

5. Useful Life:

6. Operating Costs:

7. Energy:

8. Maintenance Cost:

9. Emissions:

Contaminant

Rate or Concentration

Contaminant	Rate or Concentration

10. Stack Parameters

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

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

1.

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

2.

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

¹Explain method of determining efficiency.

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

j. Applicability to manufacturing processes:

k. Ability to construct with control device, install in available space, and operate within proposed levels:

3.

a. Control Device:

b. Operating Principles:

c. Efficiency:¹

d. Capital Cost:

e. Useful Life:

f. Operating Cost:

g. Energy:²

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

j. Applicability to manufacturing processes:

k. Ability to construct with control device, install in available space, and operate within proposed levels:

4.

a. Control Device:

b. Operating Principles:

c. Efficiency:¹

d. Capital Costs:

e. Useful Life:

f. Operating Cost:

g. Energy:²

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

j. Applicability to manufacturing processes:

k. Ability to construct with control device, install in available space, and operate within proposed levels:

F. Describe the control technology selected:

1. Control Device:

2. Efficiency:¹

3. Capital Cost:

4. Useful Life:

5. Operating Cost:

6. Energy:²

7. Maintenance Cost:

8. Manufacturer:

9. Other locations where employed on similar processes:

a. (1) Company:

(2) Mailing Address:

(3) City:

(4) State:

¹Explain method of determining efficiency.

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

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:¹

Contaminant

Rate or Concentration

Contaminant	Rate or Concentration

(8) Process Rate:¹

b. (1) Company:

(2) Mailing Address:

(3) City:

(4) State:

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:¹

Contaminant

Rate or Concentration

Contaminant	Rate or Concentration

(8) Process Rate:¹

10. Reason for selection and description of systems:

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

SECTION VII - PREVENTION OF SIGNIFICANT DETERIORATION

A. Company Monitored Data

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

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

Other data recorded _____

Attach all data or statistical summaries to this application.

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

2. Instrumentation, Field and Laboratory

a. Was instrumentation EPA referenced or its equivalent? [] Yes [] No

b. Was instrumentation calibrated in accordance with Department procedures?
[] Yes [] No [] Unknown

B. Meteorological Data Used for Air Quality Modeling

1. _____ Year(a) of data from _____ / _____ / _____ to _____ / _____ / _____
month day year month day year

2. Surface data obtained from (location) _____

3. Upper air (mixing height) data obtained from (location) _____

4. Stability wind rose (STAR) data obtained from (location) _____

C. Computer Models Used

1. _____ Modified? If yes, attach description.

2. _____ Modified? If yes, attach description.

3. _____ Modified? If yee, attach description.

4. _____ Modified? If yes, attach description.

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

D. Applicants Maximum Allowable Emission Data

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

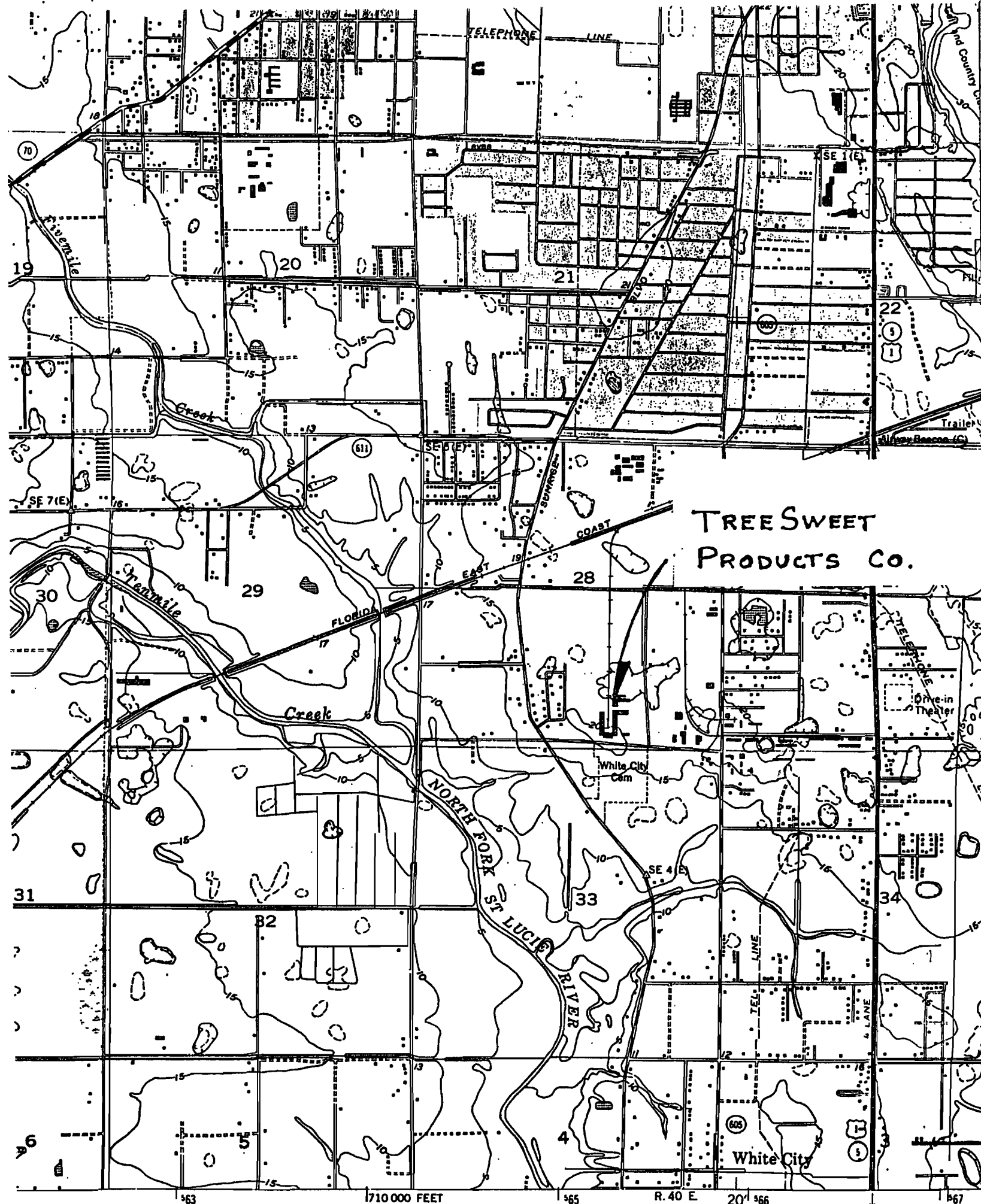
E. Emission Data Used in Modeling

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

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

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

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



ATTACHMENT 2

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

SOUTHEAST FLORIDA DISTRICT
BRANCH OFFICE

2745 SOUTHEAST MORNINGSID E BOULEVARD
PORT ST. LUCIE, FLORIDA 33452



BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

March 19, 1986

Mr. Bernard W. McBee, Jr.
General Manager
TreeSweet Products Co., Inc.
P.O. Box 189
Fort Pierce, Florida 33454

AP - St. Lucie County
TreeSweet Products

Dear Mr. McBee:

Re: Applications for Permit Modifications to Burn No. 6 Fuel Oil - Boilers 3 and 4
Feed Mill.


The referenced applications have been sent to Tallahassee for review. As "major" modifications (proposed emissions greater than 100 tons per year) they must be processed by the Bureau of Air Quality Management. Please be advised that until a determination has been made on these applications, the boilers and feed mill should be operated according to the current permit limitations.

If you should have any questions you may call me, or Bill Thomas at BAQM, telephone (904)-488-1344.

Sincerely,

Tim Powell
Permitting Section

TP:lh/l

cc: Bill Thomas 
Wayne Griffen

DER

MAR 21 1986

BAQM

ATTACHMENT 3

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM
GOVERNOR
VICTORIA J. TSCHINKEL
SECRETARY

April 15, 1986

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Bernard W. McBee, Jr.
Treesweet Products Company, Inc.
1000 Bell Avenue
Ft. Pierce, Florida 33482

Dear Mr. McBee:

RE: Permit Application Nos. AC 56-117649, -117671, and
-117673; Boilers 3, 4, and Peel Dryer/Waste Heat
Evaporator/Scrubber, Respectively

As a major modification, your applications to modify these existing sources will be processed by this office. Please make all further correspondence regarding these applications directly to our attention.

A review of your aforementioned applications to modify indicates they are incomplete. The following is required to complete your application.

For boilers No. 3 and No. 4

1. Section II-A: All changes requested are to be included (e.g. operational hours).
2. Section II-B: Estimate these dates.
3. Section II-D: Include all construction and operation permits.
4. Section II-E: Is this correct? If not, change as required.
5. Section II-F: Complete this sub-section.
6. Section III-A: Complete this sub-section including complete description of boiler. (i.e., manufacturer(s), model No(s), design heat capacity, etc.).
7. Section V-6: Provide an accurate flow diagram as your facility exists. This should clearly depict the relationship between different pieces of equipment both spatially and process related.

Mr. Bernard W. McBee, Jr.
Page Two
April 15, 1986

For: Peel dryer/waste heat evaporator/scrubber

8. Same as items 1-7 above (except item 6 where a description of this combined system is requested rather than that of a boiler).

Upon receipt of the above information processing of your applications will resume. Please refer to this letter in your response.

Should there be any questions, please call M. G. Phillips at (904)488-1344 or write to me at the above address.

Sincerely,



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

CHF/MP/s

cc: Tim Powell
Wayne E. Griffin

ATTACHMENT 4

Available upon request.

ATTACHMENT 5

GulfCoast Engineering Inc.

CONSULTING ENGINEERS

POST OFFICE BOX 1786 • BRANDON, FLORIDA 33511 • (813) 685-9727

May 29, 1986

DER

JUN 2 1986

BAQM

Florida Department
of Environmental Regulation
Bureau of Air Quality Management
2600 Blair Stone Road
Tallahassee, Florida 32301

ATTN: Mike Phillips

RE: AC56 117649
AC56 117671
AC56 117673

Dear Mr. Phillips:

We have received your information request and would like to respond using your numerology.

Specifically:

Boilers 3 and 4 are identical.

1. The only modification requested is to allow the use of an alternate fuel. No change in operational hours is contemplated.
2. The equipment is already capable of operating on #6 fuel. Consequently no construction is required.
3. The current and past permits are as follows:

SOURCE	ISSUED/EXPIRED	NUMBER
Boiler #3	6/04/82 - 6/01/87	AO-56-55650
	3/25/77 - 3/25/82	AO-56-4026
Boiler #4	1/22/81 - 1/22/86	AO-56-38284
	12/08/80 - 4/01/81	AC-56-35634
	2/14/86 - 2/14/91	AO-56-112676

4. The operational hours are correct.
5. We would like to utilize the boilers without modification or conversion to meet BACT criteria. Consequently, we would suggest operational time limitations for #6 use to retain a minor source/modification classification.
6. This information is contained on the existing permits.
7. A flow diagram is attached.

May 29, 1986
Florida Department
of Environmental Regulation
Page 2

FEEDMILL

1. The feedmill currently is equipped to operate on #6 fuel. No additional construction is necessary. No other operational changes are necessary.
2. No construction is required to operate on #6.
3. The current and past permits are as follows:

<u>SOURCE</u>	<u>ISSUED/EXPIRED</u>	<u>NUMBER</u>
Dryer- Evaporator	12/22/78 - 12/15/79	AC-56-15012
	12/22/78 - 12/22/82	AO-56-15011
	12/10/79 - 12/15/80	AC-56-25094
	12/15/80 - 12/15/81	AC-56-40775
	3/29/83 - 3/29/88	AO-56-64438

4. Because of variations in fruit availability the actual dryer operational time will be approximately 2400 hours. Maximum run time will be 2880 hours during the December thru July fresh fruit season.
5. The dryer/wasteheat evaporator is a minor source. The proposed modification is a minor modification. The dryer cannot be operated without the wasteheat evaporator. Consequently, true potential emissions should include the removal of the pollutants by the scrubber. A test run on #6 was conducted on 3/19/86. Emission levels were 4.08 #/hr and 20.4 #/hr for particulates and sulfur dioxide respectively. This would reflect annual emissions of 5.88 TNS/yr and 29.38 TNS/yr for particulates and sulfur dioxide respectively (at 2880 Hrs.). This shall be considered as the potential emissions for this source.
6. This information is in the previous permit.
7. The flow diagram is attached.

**GulfCoast
Engineering
Inc.**

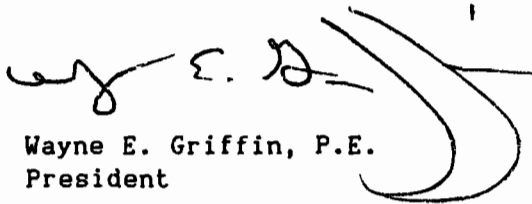
CONSULTING ENGINEERS

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May 29, 1986
Florida Department
of Environmental Regulation
Page 3

I trust this information will complete the applications.
Should you have any questions please contact me at my office
at your earliest convenience.
convenience.

Sincerely,



Wayne E. Griffin, P.E.
President

Enclosure

cc: Chet Kagel
Tim Powell

WEG/pg

GULFCOAST ENGINEERING COMPANY, INC.

CONSULTING ENGINEERS

P.O. BOX 1788 • BRANDON, FLORIDA 33511

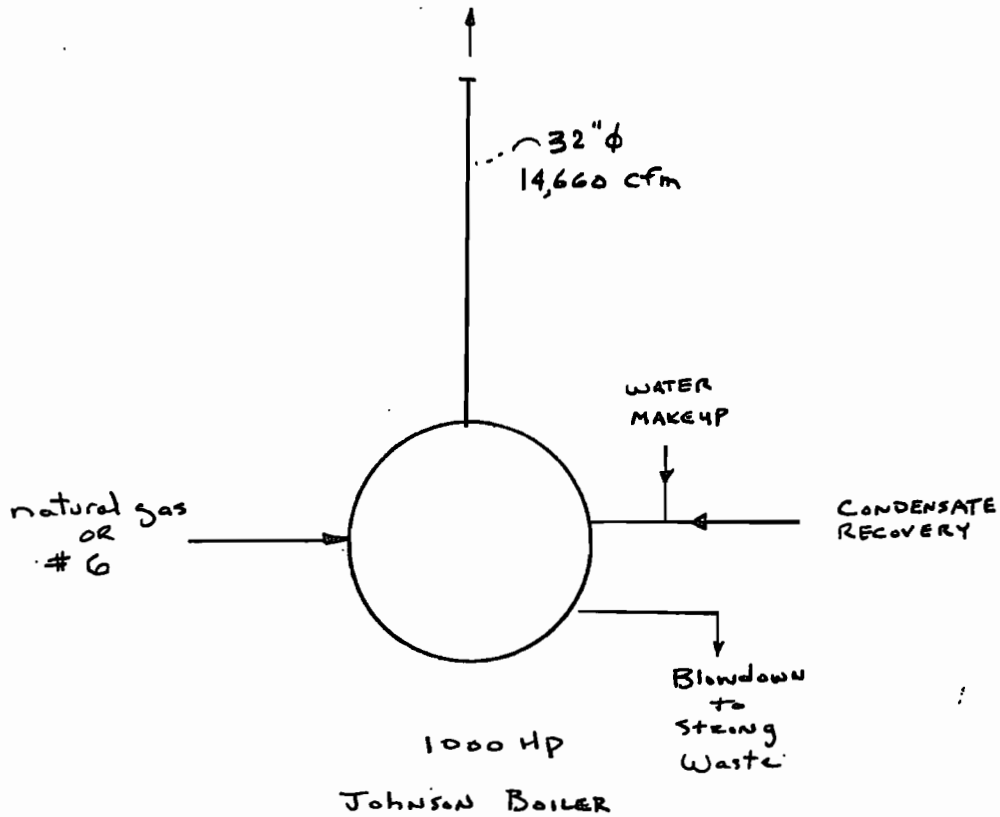
TELEPHONE: (813) 685-8727 • 685-0085

job no. _____

description TREE SWEET computed by _____ date _____

sheet _____ of _____ checked by _____ date _____

BOILERS #3 & #4



GULFCOAST ENGINEERING COMPANY, INC.

CONSULTING ENGINEERS

P.O. BOX 1788 • BRANDON, FLORIDA 33511

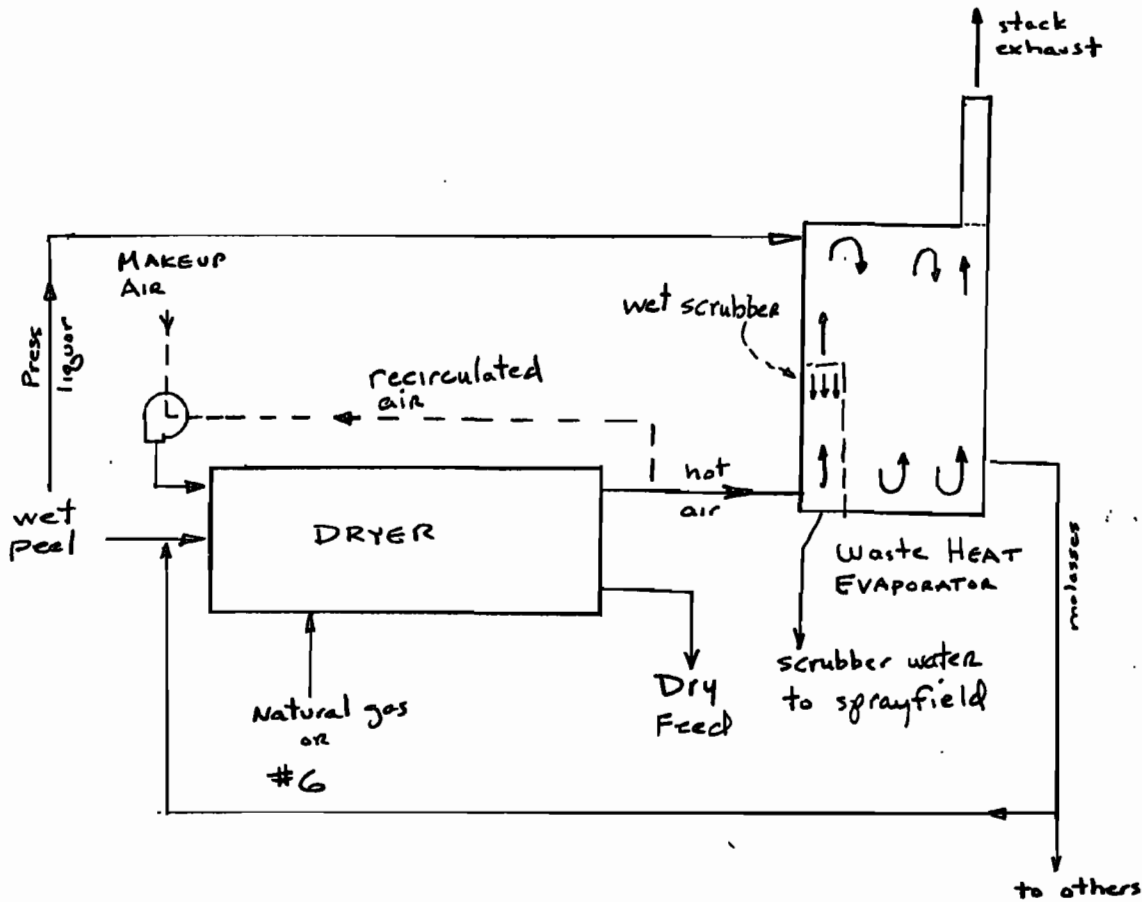
TELEPHONE: (813) 885-8727 • 885-0085

Job no. _____

description Tree Sweet computed by _____ date _____

sheet _____ of _____ checked by _____ date _____

Waste Heat Evaporator



STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION



DER

JUN 2 1986

BAQM

BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

AL MUELLER
SUBDISTRICT MANAGER

SOUTHEAST FLORIDA
SUBDISTRICT

2745 SOUTHEAST MORNINGSIDE BOULEVARD
PORT ST. LUCIE, FLORIDA 33452

PERMITTEE:

Treesweet Products, Co., Inc.
Bernard W. McBee, Jr., General Manager
P.O. Box 189
Fort Pierce, Florida 33454

I.D. Number: APIS #51/56/0009/01
Permit Number: AO-56-64438
Date of Issue: March 29, 1983
Expiration Date: March 29, 1988
County: St. Lucie
Latitude/Longitude:
Section/Township/Range:
Project: Peel Dryer/Waste Heat Evaporator

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

OPERATE:

A Peel Dryer/Waste Heat Evaporator processing 35 tons/hour wet peel; burning 40,000 ft.³/hour natural gas (40 MM BTU-hour); equipped with a wet scrubber. Hours of operation are normally 16 hours/day, 5 days/week and 30 weeks/year.

IN ACCORDANCE WITH:

Application for Renewal of Permit to Operate Air Pollution Source(s), DER Form 17-1.202(4), received 1/4/83.

LOCATED AT:

1000 Bell Avenue, Ft. Pierce. UTM: Zone 17, 565.6 km East/3031.3 North.

SUBJECT TO:

GENERAL CONDITIONS one (1) through fifteen (15) and SPECIFIC CONDITIONS one (1) through eight (8).

PERMITTEE:

Treesweet Products Co., Inc.
Bernard W. McBee, Jr., General Manager

I.D. Number: APIS #51/56/0009/01
Permit ~~XXXXXXXXXX~~ Number: AO-56-64438
Date of Issue: March 29, 1983
Expiration Date: March 29, 1988

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and as such are binding upon the permittee and enforceable pursuant to the authority of Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is hereby placed on notice that the department will review this permit periodically and may initiate enforcement action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the department.
3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor 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 does not constitute a waiver of or approval of any other department permit that may be required for other aspects of the total project which are not addressed in the permit.
4. This permit conveys no title to land or water, does not constitute state recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the state. Only the Trustees of the Internal Improvement Trust Fund may express state opinion as to title.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, plant or aquatic life or property and penalties therefor caused by the construction or operation of this permitted source, nor does it allow the permittee to cause pollution in contravention of Florida Statutes and department rules, unless specifically authorized by an order from the department.
6. The permittee shall at all times properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by department rules.
7. The permittee, by accepting this permit, specifically agrees to allow authorized department personnel, upon presentation of credentials or other documents as may be required by law, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purpose of:
 - a. Having access to and copying any records that must be kept under the conditions of the permit;
 - b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and
 - c. Sampling or monitoring any substances or parameters at any location reasonably necessary to assure compliance with this permit or department rules.Reasonable time may depend on the nature of the concern being investigated.
8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately notify and provide the department with the following information:
 - a. a description of and cause of non-compliance; and

PERMITTEE:

Treesweet Products Co., Inc.
Bernard W. McBee, Jr. General Manager

I.D. Number: APIS #51/56/0009/01
Permit/~~Check Section~~ Number: AO-56-64438
Date of Issue: March 29, 1983
Expiration Date: March 29, 1988

b. the period of noncompliance, including exact 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.

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 revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source, which are submitted to the department, may be used by the department as evidence in any enforcement case arising under the Florida Statutes or department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes.
10. The permittee agrees to comply with changes in department rules and Florida Statutes after a reasonable time for compliance, provided however, the permittee does not waive any other rights granted by Florida Statutes or department rules.
11. This permit is transferable only upon department approval in accordance with Florida Administrative Code Rules 17-4.12 and 17-30.30, as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the department.
12. This permit is required to be kept at the work site of the permitted activity during the entire period of construction or operation.
13. This permit also constitutes:
 - () Determination of Best Available Control Technology (BACT)
 - () Determination of Prevention of Significant Deterioration (PSD)
 - () Certification of Compliance with State Water Quality Standards (Section 401, PL 92-500)
 - () Compliance with New Source Performance Standards
14. The permittee shall comply with the following monitoring and record keeping requirements:
 - a. Upon request, the permittee shall furnish all records and plans required under department rules. The retention period for all records will be extended automatically, unless otherwise stipulated by the department, during the course of any unresolved enforcement action.
 - b. The permittee shall retain 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), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be at least three years from the date of the sample, measurement, report or application unless otherwise specified by department rule.
 - c. Records of monitoring information shall include:
 - the date, exact place, and time of sampling or measurements;
 - the person responsible for performing the sampling or measurements;
 - the date(s) analyses were performed;
 - the person responsible for performing the analyses;
 - the analytical techniques or methods used; and
 - the results of such analyses.
15. When requested by the department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the department, such facts or information shall be submitted or corrected promptly.

PERMITTEE:
Treesweet Products Co., Inc.
Bernard W. McBee, Jr., General Manager

I.D. Number: APIS #51/56/0009/01
Permit Number: AO-56-64438
Date of Issue: March 29, 1983
Expiration Date: March 29, 1988

SPECIFIC CONDITIONS:

1. The Permittee shall test annually for particulate and visible emissions using EPA Methods 1, 2, 3, 5 and 9 as referenced in Florida Administrative Code (FAC) Rule 17-2.700. Test dates shall be either on or prior to the anniversary date of this permit. At least 14 days prior notice will be afforded to the DER Southeast Florida Subdistrict.
2. During the compliance test, the process rate shall be 35 tons/hour wet peel, \pm 10%.
3. The emission limiting standard for particulate is defined by the Process Weight Table, 17-2.610(1), FAC Rule. The visible emissions standard is an opacity less than 20% as given in 17-2.610(2), FAC Rule.
4. The Permittee shall take necessary precautions to prevent unconfined emissions of particulate matter as deemed necessary by the Department and as referenced in 17-2.610(3)(c), FAC Rule.
5. Natural gas is the only permitted fuel for this source. In the event of emergency conditions, when the natural gas supplied is curtailed, fuel oil may be burned only upon immediate notification to the Port St. Lucie Office (within 24 hours of such a curtailment) so that a visible emissions test may be scheduled; the next regularly scheduled stack test must then be performed while firing fuel oil. If the Permittee at some later date wishes to use fuel oil in normal operations, an application must be submitted to the Port St. Lucie Office and a stack test will be rescheduled within 30 days of such a modification.
6. The permittee shall submit an Annual Operating Report for each calendar year, on forms provided by the Department, no later than March 1 of the following calendar year.
7. The stack sampling facilities shall be maintained and designed as given in 17-2.700(4)(c)., FAC Rule.
8. This permit will expire on March 29, 1988. No later than 60 days prior to this date, the Permittee shall apply for a renewed operating permit on forms provided by the Department.

Note: Based on 1/14/83 stack test results, this source is expected to emit 27.5 lb/hr particulate x 2400 hr/yr = 33 TPY. Allowable emissions based on Process Weight Table and 35 TPH wet peel are 30.6 lb/hour or 36.7 TPY.

Issued this 29th day of March, 1983

RMD:tps/8

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION



Roy M. Duke
District Manager

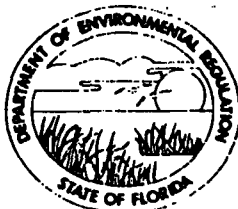
4 Pages attached.

Best Available Copy

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

SOUTHEAST FLORIDA DISTRICT
BRANCH OFFICE
2745 SOUTHEAST MORNINGSTAR BOULEVARD
PORT ST. LUCIE, FLORIDA 33452



DER

BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

JUN 2 1986

BAQM

PERMITTEE:

Bernard W. McBee, Jr.
General Manager
TreeSweet Products Co., Inc.
1000 Bell Avenue
Fort Pierce, Florida 33482

APIS No.: 50/56/0009/08
Permit Number: AO-56-112676
Date of Issue: February 14, 1986
Expiration Date: February 14, 1991
County: St. Lucie
Latitude/Longitude: 27°24'11"N/80°20'24"W
Project: Boiler #4

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

OPERATE:

1000 H.P. (17 MM BTU/hr.) Johnson fire tube process steam boiler, Model 538 AHG, burning natural gas (16,148 ft.³/hr. maximum) or No. 2 diesel oil (124 gal./hr.) as backup fuel; discharging pollutants through 36 inch I.D. stack, 38.5 ft. above ground; unlimited hours of operation.

IN ACCORDANCE WITH:

The original construction permit, AC-56-35634; "Application for Renewal of Permit to Operate Air Pollution Sources", DER Form 17-1.202(4), received November 22, 1985.

LOCATED AT:

1000 Bell Avenue, Fort Pierce. UTM Coordinates: Zone 17, 565.3 km East/3030.4 km North.

SUBJECT TO:

GENERAL CONDITIONS one (1) through fifteen (15) and SPECIFIC CONDITIONS one (1) through four (4).

PERMITTEE:

I.D. Number:
Permit/Certification Number:
Date of Issue:
Expiration Date:

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and as such are binding upon the permittee and enforceable pursuant to the authority of Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is hereby placed on notice that the department will review this permit periodically and may initiate enforcement action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the department.
3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor 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 does not constitute a waiver of or approval of any other department permit that may be required for other aspects of the total project which are not addressed in the permit.
4. This permit conveys no title to land or water, does not constitute state recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the state. Only the Trustees of the Internal Improvement Trust Fund may express state opinion as to title.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, plant or aquatic life or property and penalties therefor caused by the construction or operation of this permitted source, nor does it allow the permittee to cause pollution in contravention of Florida Statutes and department rules, unless specifically authorized by an order from the department.
6. The permittee shall at all times properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by department rules.
7. The permittee, by accepting this permit, specifically agrees to allow authorized department personnel, upon presentation of credentials or other documents as may be required by law, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purpose of:
 - a. Having access to and copying any records that must be kept under the conditions of the permit;
 - b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and
 - c. Sampling or monitoring any substances or parameters at any location reasonably necessary to assure compliance with this permit or department rules.Reasonable time may depend on the nature of the concern being investigated.
8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately notify and provide the department with the following information:
 - a. a description of and cause of non-compliance; and

PERMITTEE: .

I.D. Number:
Permit/Certification Number:
Date of Issue:
Expiration Date:

b. the period of noncompliance, including exact 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.

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 revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source, which are submitted to the department, may be used by the department as evidence in any enforcement case arising under the Florida Statutes or department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes.
10. The permittee agrees to comply with changes in department rules and Florida Statutes after a reasonable time for compliance, provided however, the permittee does not waive any other rights granted by Florida Statutes or department rules.
11. This permit is transferable only upon department approval in accordance with Florida Administrative Code Rules 17-4.12 and 17-30.30, as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the department.
12. This permit is required to be kept at the work site of the permitted activity during the entire period of construction or operation.
13. This permit also constitutes:
 - () Determination of Best Available Control Technology (BACT)
 - () Determination of Prevention of Significant Deterioration (PSD)
 - () Certification of Compliance with State Water Quality Standards (Section 401, PL 92-500)
 - () Compliance with New Source Performance Standards
14. The permittee shall comply with the following monitoring and record keeping requirements:
 - a. Upon request, the permittee shall furnish all records and plans required under department rules. The retention period for all records will be extended automatically, unless otherwise stipulated by the department, during the course of any unresolved enforcement action.
 - b. The permittee shall retain 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), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be at least three years from the date of the sample, measurement, report or application unless otherwise specified by department rule.
 - c. Records of monitoring information shall include:
 - the date, exact place, and time of sampling or measurements;
 - the person responsible for performing the sampling or measurements;
 - the date(s) analyses were performed;
 - the person responsible for performing the analyses;
 - the analytical techniques or methods used; and
 - the results of such analyses.
15. When requested by the department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the department, such facts or information shall be submitted or corrected promptly.

PERMITTEE:
Bernard W. McBee, Jr., General Manager
TreeSweet Products Co., Inc.

APIS Number: 50/56/0009/08
Permit Number: AO-56-112676
Date of Issue: February 14, 1986
Expiration Date: February 14, 1991

SPECIFIC CONDITIONS:

1. The emission limiting standard for this source is less than 20 percent opacity as referenced in FAC Rule 17-2.600(5). Compliance with the standard is accomplished by performing EPA Method 9 as referenced in FAC Rule 17-2.700.
2. Compliance with the visible emissions standard shall be tested for prior to renewal of this permit. At least 14 days prior notice will be afforded the DER Southeast Florida Subdistrict Office in Port St. Lucie. Test results must be submitted to this office within 45 days after the test date.
3. During the compliance test, the source shall be fired with the "worst-case" fuel permitted, 124 gal./hr. No. 2 Diesel, \pm 10%.
4. This permit will expire on 2/14/1991. No later than 60 days prior to this date, the Permittee shall apply for a renewal of the permit on forms provided by the Department. Along with the application, test results showing compliance with the standard must be submitted. The test must have been run no earlier than 90 days from the date of expiration. At least 14 days prior notice shall be afforded the DER Southeast Florida Office in Port St. Lucie so that a representative may witness the test.

AP:tps/17

Issued this 14th day of February, 1986

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION



Alexander Padva, Ph.D.
Acting District Manager

4 Pages attached.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

SOUTH FLORIDA
SUBDISTRICT
BRANCH OFFICE

2745 SOUTHEAST MORNINGSID E BOULEVARD
PORT ST. LUCIE, FLORIDA 33452



BOB GRAHAM
GOVERNOR
VICTORIA J. TSCHINKEL
SECRETARY

DER

JUN 2 1986

APIS #51/56 ~~BAQM~~ 03

APPLICANT:

William E. Parker
Executive Vice President
TreeSweet Products Company
Post Office Box 189
Fort Pierce, Florida 33454

PERMIT/CERTIFICATION
NO. AO 56-55650

COUNTY: St. Lucie

PROJECT: TreeSweet Products Co.
Boiler #3

This permit is issued under the provisions of Chapter 403, Florida Statutes and Chapter 17-2, Florida Administrative Code. The above named applicant, hereinafter called Permittee, is hereby authorized to perform the work or operate the facility shown on the approved drawing(s), plans, documents, and specifications attached hereto and made a part hereof and specifically described as follows:

OPERATE: A 1000 H.P. (33.5 MMBTU/HR) Johnson Firetube Boiler fired by natural gas with #2 fuel oil standby discharging pollutants to the atmosphere 25 feet above ground level.

IN ACCORDANCE WITH: Application to Operate Air Pollution Sources dated February 16, 1977 and Application for Renewal dated May 10, 1982.

LOCATED AT: 1000 Bell Avenue, Fort Pierce

UTM COORDINATES: Zone 17; 565.4 KmE, 3030.6 KmN

SERVING: A citrus processing plant (SIC# 2037)

SUBJECT TO: General Conditions 1 - 12 and Specific Condition 1 - 6.

PERMIT NO.:
APPLICANT:

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions", and as such are binding upon the permittee and enforceable pursuant to the authority of Section 403.161(1), Florida Statutes. Permittee is hereby placed on notice that the department will review this permit periodically and may initiate court action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.
2. This permit is valid only for the specific processes and operations indicated in the attached drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit shall constitute grounds for revocation and enforcement action by the department.
3. 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 notify and provide the department with the following information: (a) a description of and cause of non-compliance; and (b) the period of non-compliance, including exact 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. 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 revocation of this permit.
4. As provided in subsection 403.087(6), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor 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.
5. This permit is required to be posted in a conspicuous location at the work site or source during the entire period of construction or operation.
6. 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 arising under the Florida Statutes or department rules, except where such use is proscribed by Section 403.111, F.S.
7. In the case of an operation permit, 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.
8. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, plant, or aquatic life or property and penalties therefore caused by the construction or operation of this permitted source, nor does it allow the permittee to cause pollution in contravention of Florida Statutes and department rules, except where specifically authorized by an order from the department granting a variance or exception from department rules or state statutes.
9. This permit is not transferable. Upon sale or legal transfer of the property or facility covered by this permit, the permittee shall notify the department within thirty (30) days. The new owner must apply for a permit transfer within thirty (30) days. The permittee shall be liable for any non-compliance of the permitted source until the transferee applies for and receives a transfer of permit.
10. The permittee, by acceptance of this permit, specifically agrees to allow access to permitted source at reasonable times by department personnel presenting credentials for the purposes of inspection and testing to determine compliance with this permit and department rules.
11. This permit does not indicate a waiver of or approval of any other department permit that may be required for other aspects of the total project.
12. This permit conveys no title to land or water, nor constitutes state recognition or acknowledgement of title, and does not constitute authority for the reclamation 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.
13. This permit also constitutes:
 - Determination of Best Available Control Technology (BACT)
 - Determination of Prevention of Significant Deterioration (PSD)
 - Certification of Compliance with State Water Quality Standards (Section 401, PL 92-500)

PERMIT NO: AO 56-55650 - TreeSweet Products Company
APPLICANT: Mr. William E. Parker, Executive Vice President

SPECIFIC CONDITIONS:

1. Compliance testing shall be conducted for the sources covered by this permit prior to renewal in accordance with the methods specified below.

2. Emission limiting standard is as follows:

In accordance with Florida Administrative Code Rule 17-2.610(2), visible emissions from this boiler shall not equal or exceed an average of 20% opacity.

3. The compliance test report shall include emissions tested by the following methods:

<u>Source/Emission Point</u>	<u>Pollutant</u>	<u>Test Method</u>
Boiler #3	Visible Emissions	EPA Method 9

The compliance test report shall be submitted to the Department in accordance with Florida Administrative Code (F.A.C.) Rule 17-2.700(7).

4. Testing of emissions should be conducted using the fuel and/or process input which are expected to result in the highest emissions and within ten percent (10%) of the rated capacity of the source. Otherwise the Department may require the test to be repeated or modify the permit to reflect tested rates and/or fuels.

5. The Department shall be notified of expected test dates at least ten (10) days prior to compliance testing.

6. Copies of all reports, tests, notifications or other submittals required by this permit shall be submitted to the Department of Environmental Regulation, South Florida Subdistrict Branch Office.

PERMIT NO: AO 56-55650 - TreeSweet Products Company
APPLICANT: Mr. William E. Parker, Executive Vice President

SPECIFIC CONDITIONS (continued):

NOTE: The sources covered by this permit are expected to emit the following amounts of pollutants:

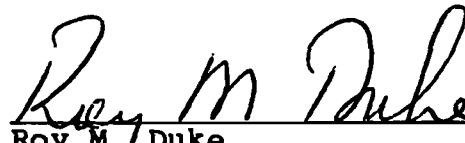
Particulate	0.4 tons/year
NO _x	2.3 tons/year

Based on: AP42-Table 1.4-1, emission factors; burning
0.016 MMCF/hr of natural gas 4800 hrs/yr.

Expiration Date: June 1, 1987

Issued this 7th day of June 1982

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION



Roy M. Duke
Subdistrict Manager

EMISSIONS TEST REPORT
TREESWEET PRODUCTS COMPANY
WASTE HEAT EVAPORATOR
MARCH 19, 1986

Prepared For:

TREESWEET PRODUCTS COMPANY
1000 BELL AVENUE
FORT PIERCE, FLORIDA

Prepared By:

ENVIRONMENTAL ENGINEERING CONSULTANTS, INC.
5119 NORTH FLORIDA AVENUE
TAMPA, FLORIDA

May 9, 1986

TABLE OF CONTENTS

I. SUMMARY

II. SOURCE DESCRIPTION

III. METHODS AND PROCEDURES

APPENDIX A - Test Data and Calculations

APPENDIX B - Process Weight Statement

APPENDIX C - Calibration Data

APPENDIX D - Chain of Custody

I. SUMMARY

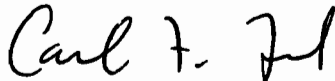
On March 19, 1986 Environmental Engineering Consultants, Inc. conducted an emissions test on the exhaust stack of the citrus peel dryer at Treesweet Products Company in Fort Pierce, Florida. Particulate matter and sulfur dioxide emission rates for certification of compliance while burning No. 6 fuel oil were determined according to procedures prescribed by the United States Environmental Protection Agency Methods 5 and 6.

The test was conducted by Carl Fink and Byron Burrows of Environmental Engineering Consultants, Inc. with the assistance and cooperation of John Lang and Mike Bryant of Treesweet Products.

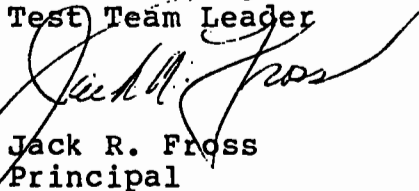
A summary of the test results is shown in Table 1. The average emissions rate was 4.08 pounds per hour of particulates and 20.40 pounds per hour of sulfur dioxide at an average process input rate of 25.75 tons per hour of wet peel. The particulate emission rate is well below the emission limiting standard of 26.90 pounds per hour. There is no emissions standard for sulfur dioxide. The facility is therefore found to be in compliance with applicable standards.

I hereby certify that these results are true and correct and were obtained by the procedures and methods described herein.

Respectfully Submitted;



Carl F. Fink
Associate Engineer
Test Team Leader



Jack R. Fross
Principal

TABLE 1
TEST SUMMATION

PLANT: Treesweet Products
 SOURCE: Waste Heat Evaporator
 DATE: March 19, 1986

Run No.	Sample Vol. (DSCF)	Flow Rate (DSCFM)	Moisture (%)	Stack Temp. (°F)	Isokinetics (%)	Particulate Emissions (lb/hr)	SO2 Emissions (lb/hr)
1	40.462	16,766	20.97	146	100.0	2.59	22.98
2	37.303	14,553	30.79	160	106.2	3.80	13.31
3	36.130	13,930	35.83	168	107.5	5.86	24.91
Average		15,083	29.20	158	104.6	4.08	20.40
					Allowable *	26.90	N/A

* Allowable Emissions Rate from 17-2.610(1)(b); E = 3.59 po.62

II. SOURCE DESCRIPTION

Treesweet Products Company processes fruit juice and a dried citrus peel used as animal feed. After removing the juice, the wet peel is shredded and lime is added. After pressing to remove liquids and essential oils, the peel is conveyed to the dryer where the moisture content is reduced from approximately 75 percent to 15 percent. The dried peel is loaded into trucks for shipping, and exhaust gases are passed through a scrubber and then through a heat recovery unit before being vented to the atmosphere (Figure 1). During this test the dryer was being fired with a No. 6 fuel oil with a sulfur content of 2.5 percent.

The stack is 38 inches in diameter and approximately 100 feet high with two sampling ports. The sampling ports are located 0.63 diameters upstream and 3.8 diameters downstream from flow disturbances in the exhaust flow (Figure 2).

Process input rates were determined by combining the dried peel output with the moisture removed by the drier. The dried peel output was determined by Treesweet. Analysis of the wet peel input and dry feed output were used to calculate the moisture removed during drying. The samples were composited prior to analysis to obtain average values.

AC 56-117673

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

RECEIVED

SOUTHEAST FLORIDA
SUBDISTRICT

2745 SOUTHEAST MORNINGSIDE BOULEVARD
PORT ST. LUCIE, FLORIDA 33482



MAR 17 1986
Dept. of Environmental Reg
Port St. Lucie

BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

AL MUELLER
SUBDISTRICT MANAGER

DER

MAR 19 1986

BAQM

APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: Citrus Pulp Dehydrator System [] New¹ [x] Existing¹

APPLICATION TYPE: [] Construction [] Operation [x] Modification

COMPANY NAME: TREESWEET PRODUCTS COMPANY, INC. COUNTY: ST. LUCIE

Identify the specific emission point source(s) addressed in this application (i.e. Lime waste heat evaporator Kiln No. 4 with Venturi Scrubber; Peaking Unit No. 2, Gas Fired) and scrubber, peel dryer

SOURCE LOCATION: Street 1000 Bell Avenue City Ft. Pierce

UTM: East 714,120' North 1,114,050'

Latitude 27 ° 24 ' 11 "N Longitude 80 ° 20 ' 24 "W

APPLICANT NAME AND TITLE: Bernard W. McBee, Jr. General Manager

APPLICANT ADDRESS: 1000 Bell Avenue, Ft. Pierce, Florida 33482

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

I am the undersigned owner or authorized representative* of TreeSweet Products Co., Inc.

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

*Attach letter of authorization.

Signed Bernard W. McBee, Jr.

Bernard W. McBee, Jr. General Manager
Name and Title (Please Type)

Date: 3/10/86 Telephone No. (305) 461-3800

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

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

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

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



Signed Wayne E. Griffin
Wayne E. Griffin
Name (Please Type)

GulfCoast Engineering, Inc.
Company Name (Please Type)

913 S. Parsons Avenue-Suite A, Brandon, Florida 33511
Mailing Address (Please Type)

Florida Registration No. 19974 Date: 3/12/86 Telephone No. (813)685-9727

SECTION II: GENERAL PROJECT INFORMATION

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

TreeSweet desires to use #6 fuel oil as the primary fuel when it is
financially advantageous utilizing existing equipment.

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

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

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

Current permit #A0-56-64438 expires 3/29/88

E. Requested permitted equipment operating time: hrs/day 24 ; days/wk 6 ; wks/yr 30 ;
if power plant, hrs/yr _____; if seasonal, describe: Operates during fruit
processing season; normally December through July.

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

1. Is this source in a non-attainment area for a particular pollutant? _____
 - a. If yes, has "offset" been applied? _____
 - b. If yes, has "Lowest Achievable Emission Rate" been applied? _____
 - c. If yes, list non-attainment pollutants. _____
2. Does best available control technology (BACT) apply to this source?
If yes, see Section VI. _____
3. Does the State "Prevention of Significant Deterioration" (PSD)
requirement apply to this source? If yes, see Sections VI and VII. _____
4. Do "Standards of Performance for New Stationary Sources" (NSPS)
apply to this source? _____
5. Do "National Emission Standards for Hazardous Air Pollutants"
(NESHAP) apply to this source? _____

- H. Do "Reasonably Available Control Technology" (RACT) requirements apply
to this source? _____
- a. If yes, for what pollutants? _____
 - b. If yes, in addition to the information required in this form,
any information requested in Rule 17-2.650 must be submitted.

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

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

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

Description	Contaminants		Utilization Rate - lbs/hr	Relate to Flow Diagram
	Type	% Wt		
Wet Citrus Peel	Particulate	±1%	81,000#/Hr.	in feed to feed mill
Dry Lime	-	0	100#/Hr.	Added to Citrus Peel
Plant Waste Water and spent caustic	-	0	9,000#/Hr.	to evaporator feed tank #2

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

- Total Process Input Rate (lbs/hr): 90,100
- Product Weight (lbs/hr): Approximately 18,000#/Hr. feed @ 10% moisture

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

Name of Contaminant	Emission ¹		Allowed Emission Rate per Rule 17-2	Allowable ³ Emission lbs/hr	Potential ⁴ Emission		Relate to Flow Diagram
	Maximum lbs/hr	Actual T/yr			lbs/yr	T/yr	
Particulates	3.38#/Hr.	4.1	17-2.600(10)	20% opacity	1.97x10 ⁶	984	-
Sulfur Dioxide	*	*	& 17-2.610	31.3#/Hr.	3.4x10 ⁵	169	-
Carbon Monoxide	*	*			4320	2.2	-
Hydrocarbons	*	*			864	.4	-
Nitrogen Oxides	*	*			1.04x10 ⁵	51.8	-

¹See Section V, Item 2.

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

³Calculated from operating rate and applicable standard.

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

* Actual emission are unknown ; to be tested

** Based on 2400 Hrs. of operation without wet scrubber control.

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

Name and Type (Model & Serial No.)	Contaminant	Efficiency	Range of Particles Size Collected (in microns) (If applicable)	Basis for Efficiency (Section V Item 5)
Wet Scrubber	Particulate	99±%	Particulates of 1mm and under @ 140° F.	

E. Fuels

Type (Be Specific)	Consumption*		Maximum Heat Input (MMBTU/hr)
	avg/hr	max./hr	
Natural Gas	4 x 10 ⁴ cf/Hr.	4.8 x 10 ⁴ cf/Hr.	48
#6 Oil	240 gal/Hr.	360 gal/Hr.	54.7

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

Fuel Analysis: No.6

Percent Sulfur: 2.5 Percent Ash: .05

Density: 9.0 @ 60°F lbs/gal Typical Percent Nitrogen: 0.5

Heat Capacity: 152.000 BTU/lb BTU/gal

Other Fuel Contaminants (which may cause air pollution): _____

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

Annual Average 0 Maximum 0

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

Solids become animal feed. Liquids are utilized in cooling, scrubbing,
washdowns and evaporator cleanups ultimately disposed of in plant wastewater
system.

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

Stack Height: _____ ft. Stack Diameter: _____ ft.
Gas Flow Rate: _____ ACFM _____ DSCFM Gas Exit Temperature: _____ °F.
Water Vapor Content: _____ % Velocity: _____ FPS

SECTION IV: INCINERATOR INFORMATION

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

Description of Waste _____

Total Weight Incinerated (lbs/hr) _____ Design Capacity (lbs/hr) _____

Approximate Number of Hours of Operation per day _____ day/wk _____ wks/yr. _____

Manufacturer _____

Date Constructed _____ Model No. _____

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

Stack Height: _____ ft. Stack Diameter: _____ Stack Temp. _____

Gas Flow Rate: _____ ACFM _____ DSCFM* Velocity: _____ FPS

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

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

Brief description of operating characteristics of control devices: _____

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

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

SECTION V: SUPPLEMENTAL REQUIREMENTS

Please provide the following supplements where required for this application.

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

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

SECTION VI: BEST AVAILABLE CONTROL TECHNOLOGY

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

Yes No

Contaminant

Rate or Concentration

Contaminant	Rate or Concentration

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

Yes No

Contaminant

Rate or Concentration

Contaminant	Rate or Concentration

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

Contaminant

Rate or Concentration

Contaminant	Rate or Concentration

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

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

*Explain method of determining

5. Useful Life:

6. Operating Costs:

7. Energy:

8. Maintenance Cost:

9. Emissions:

Contaminant

Rate or Concentration

Contaminant	Rate or Concentration

10. Stack Parameters

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

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

1.

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

2.

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

¹Explain method of determining efficiency.

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

j. Applicability to manufacturing processes:

k. Ability to construct with control device, install in available space, and operate within proposed levels:

3.

a. Control Device:

b. Operating Principles:

c. Efficiency:¹

d. Capital Cost:

e. Useful Life:

f. Operating Cost:

g. Energy:²

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

j. Applicability to manufacturing processes:

k. Ability to construct with control device, install in available space, and operate within proposed levels:

4.

a. Control Device:

b. Operating Principles:

c. Efficiency:¹

d. Capital Costs:

e. Useful Life:

f. Operating Cost:

g. Energy:²

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

j. Applicability to manufacturing processes:

k. Ability to construct with control device, install in available space, and operate within proposed levels:

F. Describe the control technology selected:

1. Control Device:

2. Efficiency:¹

3. Capital Cost:

4. Useful Life:

5. Operating Cost:

6. Energy:²

7. Maintenance Cost:

8. Manufacturer:

9. Other locations where employed on similar processes:

a. (1) Company:

(2) Mailing Address:

(3) City:

(4) State:

¹Explain method of determining efficiency.

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

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:¹

Contaminant

Rate or Concentration

(8) Process Rate:¹

b. (1) Company:

(2) Mailing Address:

(3) City:

(4) State:

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:¹

Contaminant

Rate or Concentration

(8) Process Rate:¹

10. Reason for selection and description of systems:

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

SECTION VII - PREVENTION OF SIGNIFICANT DETERIORATION

A. Company Monitored Data

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

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

Other data recorded _____

Attach all data or statistical summaries to this application.

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

2. Instrumentation, Field and Laboratory

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

B. Meteorological Data Used for Air Quality Modeling

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

C. Computer Models Used

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

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

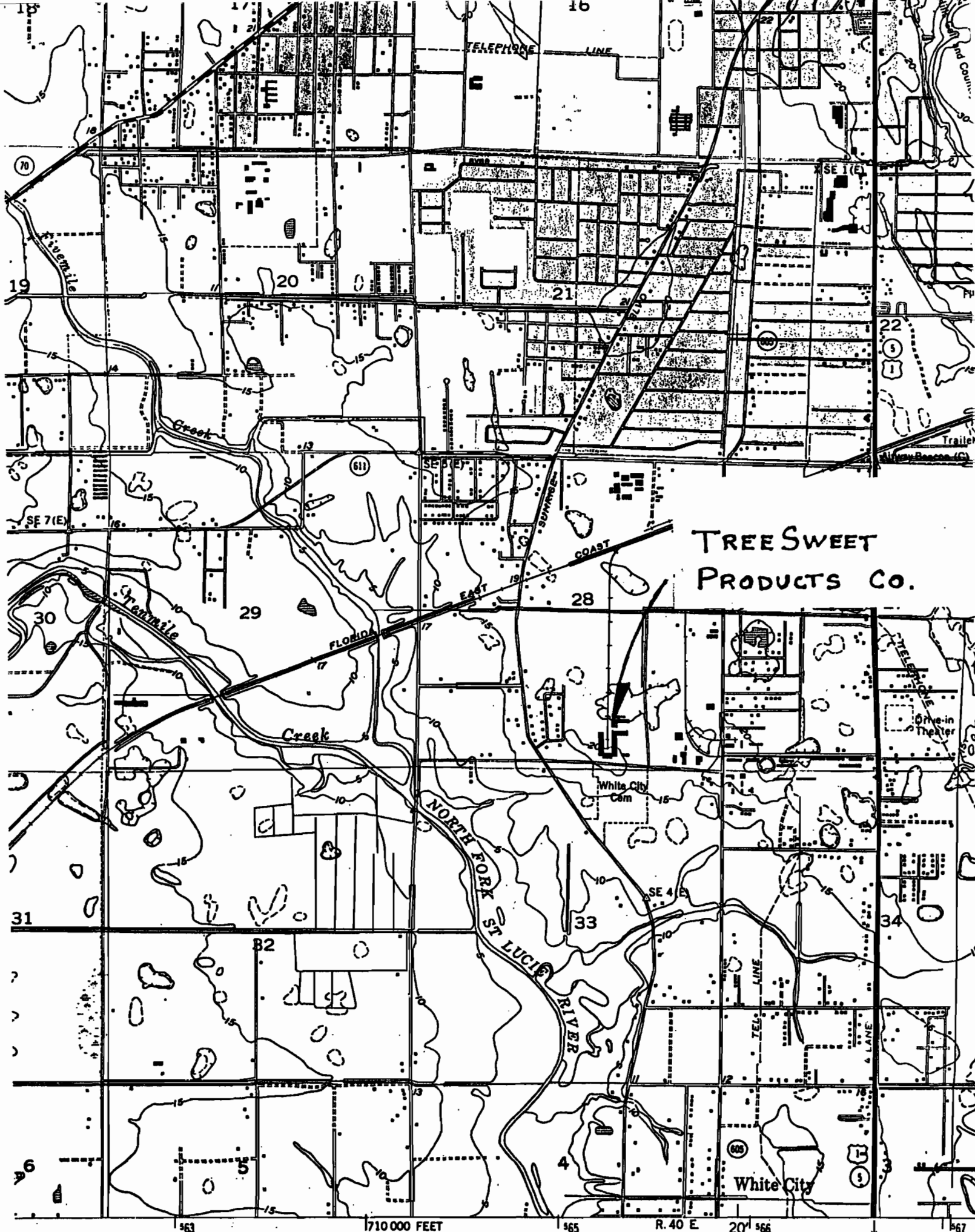
D. Applicants Maximum Allowable Emission Data

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

E. Emission Data Used in Modeling

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

- F. Attach all other information supportive to the PSD review.
- G. Discuss the social and economic impact of the selected technology versus other applicable technologies (i.e., jobs, payroll, production, taxes, energy, etc.). Include assessment of the environmental impact of the sources.
- H. Attach scientific, engineering, and technical material, reports, publications, journals, and other competent relevant information describing the theory and application of the requested best available control technology.



by the U. S. Coast & Geodetic Survey
 and published by the Geological Survey

STUART 14 MI.
 WEST PALM BEACH 58 MI.

**GULF COAST ENGINEERING COMPANY
CONSULTING ENGINEERS**

P.O. BOX 1786 • BRANDON, FLORIDA 33511
TELEPHONE: (813) 685-9727 • 685-0085

Job no. _____
 description Tree Sweet Products computed by WT date 3-11-86
 sheet 1 of 1 checked by _____ date _____

Waste Heat Evaporator

Uncontrolled emissions

	Process Particulates	-	± 1%	=	81,000 #/hr	×	1%	=	810 #/hr
#6 {	Fuel Particulates	-	28 #/10 ³ gal	=	28 × 360 gph	÷	1000	=	10.1 #/hr
	Sulfur Dioxide	-	393 #/10 ³ gal	=	393 × 360 gph	÷	1000	=	141 #/hr
	Carbon Monoxide	-	5 #/10 ³ gal	=	5 × 360 gph	÷	1000	=	1.8 #/hr
	Hydrocarbons	-	1 #/10 ³ gal	=	1 × 360 gph	÷	1000	=	3.6 #/hr
	Nitrogen Oxides	-	120 #/10 ³ gal	=	120 × 360 gph	÷	1000	=	43.2 #/hr

Controlled emissions (per test)

Process Particulates = 30.85 TMS/hr × 1% particulates = 617 #/hr
 potential uncontrolled emissions = 617 + 10.1 = 627.1 #/hr
 Actual emissions = 3.38 #/hr

Particulate % removal = 99.46%

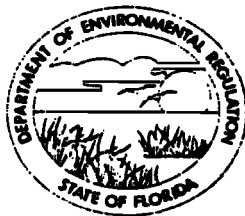
Controlled emissions for sulfur dioxide, carbon monoxide, hydrocarbons, & nitrogen oxides are unknown. It is anticipated the emission levels of these parameters will be significantly less than the uncontrolled emissions.

Annual emission levels based on 2400 hrs of operation

DEPARTMENT OF ENVIRONMENTAL REGULATION

SOUTHEAST FLORIDA
SUBDISTRICT

2745 SOUTHEAST MORNINGSIDE BOULEVARD
PORT ST. LUCIE, FLORIDA 33452



RECEIVED

MAR 17 1986

Dept. of Environmental Reg
Port St. Lucie

BOB GRAHAM
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VICTORIA J. TSCHINKEL
SECRETARY

AL MUELLER
SUBDISTRICT MANAGER

APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: Industrial Steam Process Boiler [] New¹ [~~oo~~] Existing¹

APPLICATION TYPE: [] Construction [] Operation [~~oo~~] Modification

COMPANY NAME: TREESWEET PRODUCTS COMPANY INC. COUNTY: ST. LUCIE

Identify the specific emission point source(s) addressed in this application (i.e. Lime
Kiln No. 4 with Venturi Scrubber; Peaking Unit No. 2, Gas Fired) Boiler #3

SOURCE LOCATION: Street 1000 Bell Avenue City Ft. Pierce

UTM: East 714,120' North 1,114,050'

Latitude 27 ° 24 ' 11 "N Longitude 80 ° 20 ' 24 "W

APPLICANT NAME AND TITLE: Bernard W. McBee, Jr. General Manager

APPLICANT ADDRESS: 1000 Bell Avenue, Ft. Pierce, Florida 33482

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

I am the undersigned owner or authorized representative* of TreeSweet Products Co., Inc.

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

*Attach letter of authorization

Signed: Bernard W. McBee, Jr.

Bernard W. McBee, Jr. General Manager
Name and Title (Please Type)

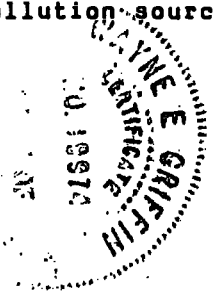
Date: 3/10/86 Telephone No. (305)461-3800

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

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

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

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



Signed Wayne E. Griffin

Wayne E. Griffin
Name (Please Type)

GulfCoast Engineering, Inc.
Company Name (Please Type)

913 S. Parsons Avenue-Suite A, Brandon, Florida 33511
Mailing Address (Please Type)

Florida Registration No. 19974 Date: 3/12/86 Telephone No. (813)685-9727

SECTION II: GENERAL PROJECT INFORMATION

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

TreeSweet desires to use #6 fuel oil as the primary fuel when it is financially advantageous utilizing existing equipment.

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

Start of Construction _____ Completion of Construction _____

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

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

Current Permit #A0-56-55650 expires 6-1-87

E. Requested permitted equipment operating time: hrs/day 18; days/wk 6; wka/yr 52;
if power plant, hrs/yr _____; if seasonal, describe: Citrus processing season
December through July (normally)

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

1. Is this source in a non-attainment area for a particular pollutant? _____
 - a. If yes, has "offset" been applied? _____
 - b. If yes, has "Lowest Achievable Emission Rate" been applied? _____
 - c. If yes, list non-attainment pollutants. _____
2. Does best available control technology (BACT) apply to this source?
If yes, see Section VI. _____
3. Does the State "Prevention of Significant Deterioration" (PSD)
requirement apply to this source? If yes, see Sections VI and VII. _____
4. Do "Standards of Performance for New Stationary Sources" (NSPS)
apply to this source? _____
5. Do "National Emission Standards for Hazardous Air Pollutants"
(NESHAP) apply to this source? _____

- H. Do "Reasonably Available Control Technology" (RACT) requirements apply
to this source? _____
- a. If yes, for what pollutants? _____
 - b. If yes, in addition to the information required in this form,
any information requested in Rule 17-2.650 must be submitted.

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

Best Available Copy

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

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

Description	Contaminants		Utilization Rate - lbs/hr	Relate to Flow Diagram
	Type	% Wt		

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

1. Total Process Input Rate (lbs/hr): N/A
2. Product Weight (lbs/hr): Approximately 33,000 (steam)

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

Name of Contaminant	Emission ¹		Allowed Emission Rate per Rule 17-2 ²	Allowable Emission lbs/hr ³	Potential ⁴ Emission		Relate to Flow Diagram
	Maximum lbs/hr	Actual T/yr			lbs/yr	T/yr	
Particulates	77	87	17-2.600(10)	20% opacity	6.7x10 ⁵	337	-
Sulfur Dioxide	108	120			9.5x10 ⁵	473	-
Carbon Monoxide	1.4	1.5			12,260	6	-
Hydrocarbon	.28	.3			2,450	1.2	-
Nitrogen Oxides	33	37			2.9x10 ⁵	144	-

¹See Section V, Item 2.

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

³Calculated from operating rate and applicable standard.

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

D. Control Devices: (See Section V, Item 4) None

Name and Type (Model & Serial No.)	Contaminant	Efficiency	Range of Particles Size Collected (in microns) (If applicable)	Basis for Efficiency (Section V Item 5)

E. Fuels

Type (Be Specific)	Consumption*		Maximum Heat Input (MMBTU/hr)
	avg/hr	max./hr	
Natural Gas	16,900 cf/Hr.	41,850 cf/hr	43.9
No. 2 Fuel Oil	110 gal/hr.	276 gph	38.6
No. 6 Fuel Oil	110 gal/hr.	276 gph	41.9

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

Fuel Analysis: No. 6

Percent Sulfur: 2.5 Percent Ash: .05

Density: 9.0 @ 60°F lbs/gal Typical Percent Nitrogen: .5

Heat Capacity: - BTU/lb 152,000 BTU/gal

Other Fuel Contaminants (which may cause air pollution): _____

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

Annual Average 0 Maximum 0

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

Liquid wastes disposed of in plant waste water system.

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

Stack Height: 38.5 ft. Stack Diameter: 2.67 ft.
 Gas Flow Rate: 14,660 ACFM - DSCFM Gas Exit Temperature: 425 °F.
 Water Vapor Content: 8.2% % Velocity: 44 FPS

SECTION IV: INCINERATOR INFORMATION N/A

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

Description of Waste _____

Total Weight Incinerated (lbs/hr) _____ Design Capacity (lbs/hr) _____

Approximate Number of Hours of Operation per day _____ day/wk _____ wks/yr. _____

Manufacturer _____

Date Constructed _____ Model No. _____

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

Stack Height: _____ ft. Stack Diameter: _____ Stack Temp. _____

Gas Flow Rate: _____ ACFM _____ DSCFM* Velocity: _____ FPS

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

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

Brief description of operating characteristics of control devices: _____

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

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

SECTION V: SUPPLEMENTAL REQUIREMENTS

Please provide the following supplements where required for this application.

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

Best Available Copy

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

SECTION VI: BEST AVAILABLE CONTROL TECHNOLOGY

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

Yes No

Contaminant

Rate or Concentration

Contaminant	Rate or Concentration

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

Yes No

Contaminant

Rate or Concentration

Contaminant	Rate or Concentration

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

Contaminant

Rate or Concentration

Contaminant	Rate or Concentration

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

1. Control Device/System:

2. Operating Principles:

3. Efficiency:*

4. Capital Costs:

*Explain method of determining

- 5. Useful Life:
- 7. Energy:
- 9. Emissions:

- 6. Operating Costs:
- 8. Maintenance Cost:

Contaminant	Rate or Concentration

10. Stack Parameters

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

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

1.

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

2.

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

¹Explain method of determining efficiency.

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

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

- 3.
- a. Control Device:
 - b. Operating Principles:
 - c. Efficiency:¹
 - d. Capital Cost:
 - e. Useful Life:
 - f. Operating Cost:
 - g. Energy:²
 - h. Maintenance Cost:
 - i. Availability of construction materials and process chemicals:
 - j. Applicability to manufacturing processes:
 - k. Ability to construct with control device, install in available space, and operate within proposed levels:

- 4.
- a. Control Device:
 - b. Operating Principles:
 - c. Efficiency:¹
 - d. Capital Costs:
 - e. Useful Life:
 - f. Operating Cost:
 - g. Energy:²
 - h. Maintenance Cost:
 - i. Availability of construction materials and process chemicals:
 - j. Applicability to manufacturing processes:
 - k. Ability to construct with control device, install in available space, and operate within proposed levels:

F. Describe the control technology selected:

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

¹Explain method of determining efficiency.

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

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:¹

Contaminant

Rate or Concentration

(8) Process Rate:¹

b. (1) Company:

(2) Mailing Address:

(3) City:

(4) State:

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:¹

Contaminant

Rate or Concentration

(8) Process Rate:¹

10. Reason for selection and description of systems:

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

SECTION VII - PREVENTION OF SIGNIFICANT DETERIORATION

A. Company Monitored Data

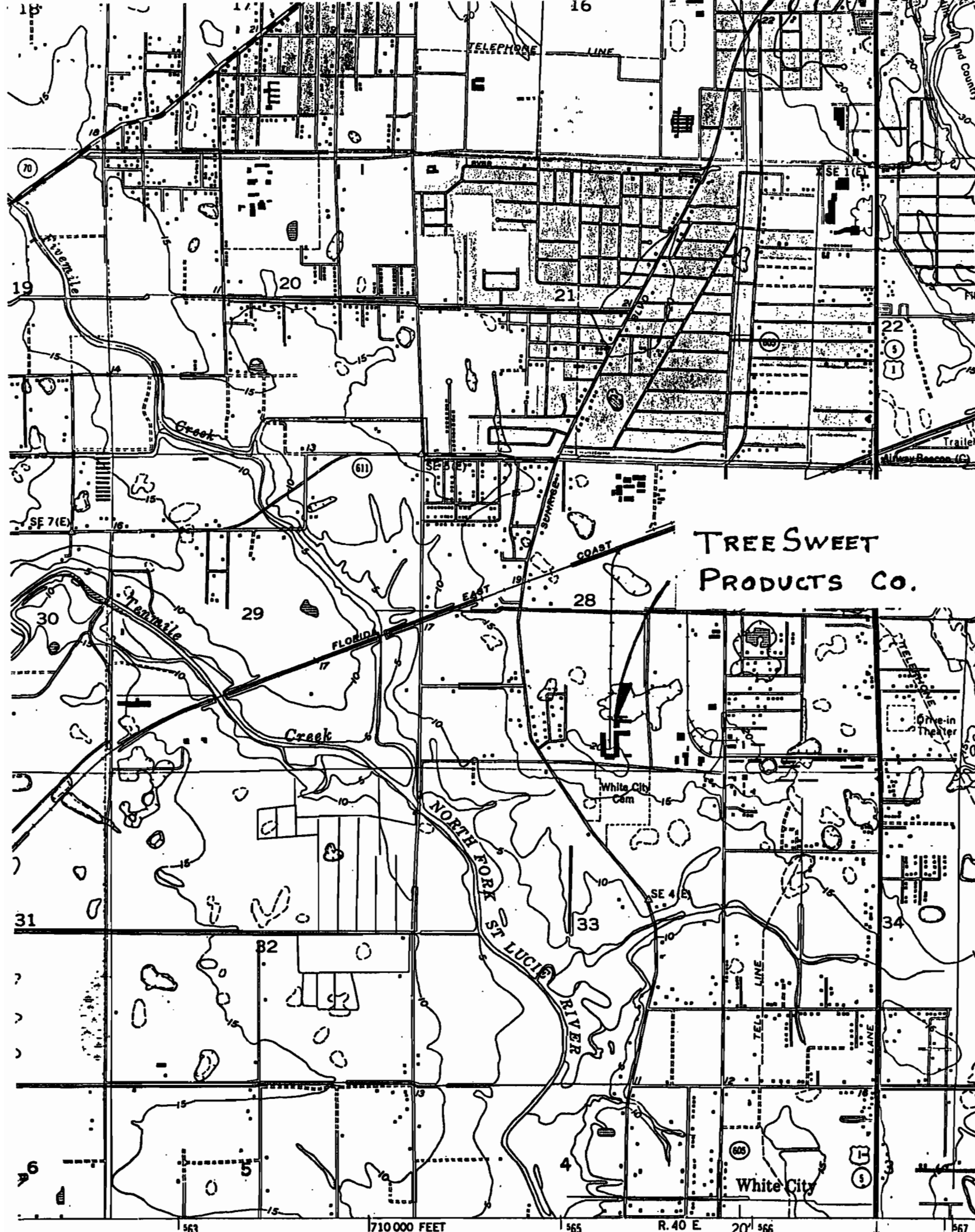
1. _____ no. sites _____ TSP _____ () SO₂* _____ Wind spd/dir

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

Other data recorded _____

Attach all data or statistical summaries to this application.

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



TREE SWEET
PRODUCTS CO.

White City

White City
Cem.

Drive-in
Theater

GULF COAST ENGINEERING COMPANY

CONSULTING ENGINEERS

P.O. BOX 1786 • BRANDON, FLORIDA 33511

TELEPHONE: (813) 685-8727 • 685-0085

Job no. _____

description _____

Tree Sweet Products

computed by WLT

date 3-12-86

sheet 2

of 2

checked by _____

date _____

Boilers #3 & #4

Uncontrolled Emissions

Particulates	@	28 #/10 ³ gal	@	276 gph	=	77 #/hr
Sulfur Dioxide	@	393 #/10 ³ gal	@	276 gph	=	108 #/hr
Carbon Monoxide	@	5 #/10 ³ gal	@	276 gph	=	1.38 #/hr
Hydrocarbons	@	1 #/10 ³ gal	@	276 gph	=	.28 #/hr
Nitrogen Oxides	@	120 #/10 ³ gal	@	276 gph	=	33 #/hr

Emissions are calculated using table 1.3-11 AP-42

Annual emissions are based on 5616 Hours of operation
Potential emissions are based on 8760 Hours of operation

Actual Emissions

Particulates	@	28 #/10 ³ gal	@	110 gph	=	31 #/hr
Sulfur Dioxide	@	393 #/10 ³ gal	@	110 gph	=	43 #/hr
Carbon Monoxide	@	5 #/10 ³ gal	@	110 gph	=	.55 #/hr
Hydrocarbon	@	1 #/10 ³ gal	@	110 gph	=	.10 #/hr
Nitrogen Oxides	@	120 #/10 ³ gal	@	110 gph	=	13 #/hr

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

AC 36-117671

RECEIVED

SOUTHEAST FLORIDA
SUBDISTRICT

2745 SOUTHEAST MORNINGSIDE BOULEVARD
PORT ST. LUCIE, FLORIDA 33482



MAR 17 1986

Department of Environmental Regulation
Port St. Lucie

BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

AL MUELLER
SUBDISTRICT MANAGER

APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: Industrial Steam Process Boiler [] New¹ [x] Existing¹

APPLICATION TYPE: [] Construction [] Operation [x] Modification

COMPANY NAME: TREESWEET PRODUCTS COMPANY INC. COUNTY: ST. LUCIE

Identify the specific emission point source(s) addressed in this application (i.e. Lime
Kiln No. 4 with Venturi Scrubber; Peaking Unit No. 2, Gas Fired) Boiler #4

SOURCE LOCATION: Street 1000 Bell Avenue City Ft. Pierce

UTM: East 714,120' North 1,114,050'

Latitude 27 ° 24 ' 11 "N Longitude 80 ° 20 ' 24 "W

APPLICANT NAME AND TITLE: Bernard W. McBee, Jr. General Manager

APPLICANT ADDRESS: 1000 Bell Avenue, Ft. Pierce, Florida 33482

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

I am the undersigned owner or authorized representative* of TreeSweet Products Co., Inc.

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

*Attach letter of authorization

Signed: Bernard W. McBee, Jr.

Bernard W. McBee, Jr. General Manager
Name and Title (Please Type)

Date: 3/10/86 Telephone No. (305)461-3800

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

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

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

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



Signed Wayne E. Griffin

Wayne E. Griffin
Name (Please Type)

GulfCoast Engineering, Inc.
Company Name (Please Type)

913 S. Parsons Avenue-Suite A, Brandon, Florida 33511
Mailing Address (Please Type)

Florida Registration No. 19974 Date: 3/12/86 Telephone No. (813)685-9727

SECTION II: GENERAL PROJECT INFORMATION

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

TreeSweet desires to use #6 fuel oil as the primary fuel when it is financially advantageous utilizing existing equipment.

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

Start of Construction _____ Completion of Construction _____

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

Current Permit #A0-56-112670 expires 2/14/91

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

E. Requested permitted equipment operating time: hrs/day 18; days/wk 6; wks/yr 52;
if power plant, hrs/yr _____; if seasonal, describe: Citrus processin season
December through July (normally)

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

- 1. Is this source in a non-attainment area for a particular pollutant? _____
 - a. If yes, has "offset" been applied? _____
 - b. If yes, has "Lowest Achievable Emission Rate" been applied? _____
 - c. If yes, list non-attainment pollutants. _____
- 2. Does best available control technology (BACT) apply to this source?
If yes, see Section VI. _____
- 3. Does the State "Prevention of Significant Deterioration" (PSD)
requirement apply to this source? If yes, see Sections VI and VII. _____
- 4. Do "Standards of Performance for New Stationary Sources" (NSPS)
apply to this source? _____
- 5. Do "National Emission Standards for Hazardous Air Pollutants"
(NESHAP) apply to this source? _____

- H. Do "Reasonably Available Control Technology" (RACT) requirements apply
to this source? _____
 - a. If yes, for what pollutants? _____
 - b. If yes, in addition to the information required in this form,
any information requested in Rule 17-2.650 must be submitted.

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

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

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

Description	Contaminants		Utilization Rate - lbs/hr	Relate to Flow Diagram
	Type	% Wt		

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

1. Total Process Input Rate (lbs/hr): _____
2. Product Weight (lbs/hr): Approximately 33,000 (steam)

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

Name of Contaminant	Emission ¹		Allowed Emission Rate per Rule 17-2	Allowable ³ Emission lbs/hr	Potential ⁴ Emission		Relate to Flow Diagram
	Maximum lbs/hr	Actual T/yr			lbs/yr	T/yr	
Particulates	77	87	17-2.600(10)	20% opacity	6.7x10 ⁵	337	-
Sulfur Dioxide	108	120			9.5x10 ⁵	473	-
Carbon Monoxide	1.4	1.5			12,260	6	-
Hydrocarbon	.28	.3			2,450	1.2	-
Nitrogen Oxides	33	37			2.9x10 ⁵	144	-

¹See Section V, Item 2.

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

³Calculated from operating rate and applicable standard.

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

D. Control Devices: (See Section V, Item 4) NONE

Name and Type (Model & Serial No.)	Contaminant	Efficiency	Range of Particles Size Collected (in microns) (If applicable)	Basis for Efficiency (Section V Item 5)

E. Fuels

Type (Be Specific)	Consumption*		Maximum Heat Input (MMBTU/hr)
	avg/hr	max./hr	
Natural Gas	16,900 cf/Hr.	41,850 cf/Hr.	43.9
No. 2 Fuel Oil	110 gal/Hr.	276 gph	38.6
No. 6 Fuel Oil	110 gal/Hr.	276 gph	41.9

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

Fuel Analysis: no.6

Percent Sulfur: 2.5 Percent Ash: .05

Density: 9 @ 60° F lbs/gal Typical Percent Nitrogen: .5

Heat Capacity: BTU/lb 152,000 BTU/gal

Other Fuel Contaminants (which may cause air pollution):

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

Annual Average 0 Maximum 0

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

Liquid wastes disposed of in plant waste water system.

Best Available Copy

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

Stack Height: 38.5 ft. Stack Diameter: 2.67 ft.
 Gas Flow Rate: 14,660 ACFM _____ DSCFM Gas Exit Temperature: 425 °F.
 Water Vapor Content: 8.2% % Velocity: 44 FPS

SECTION IV: INCINERATOR INFORMATION N/A

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

Description of Waste _____

Total Weight Incinerated (lbs/hr): _____ Design Capacity (lbs/hr) _____

Approximate Number of Hours of Operation per day _____ day/wk _____ wks/yr. _____

Manufacturer _____

Date Constructed _____ Model No. _____

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

Stack Height: _____ ft. Stack Diameter: _____ Stack Temp. _____

Gas Flow Rate: _____ ACFM _____ DSCFM* Velocity: _____ FPS

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

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

Brief description of operating characteristics of control devices: _____

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

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

SECTION V: SUPPLEMENTAL REQUIREMENTS

Please provide the following supplements where required for this application.

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

Best Available Copy

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

SECTION VI: BEST AVAILABLE CONTROL TECHNOLOGY

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

Yes No

Contaminant

Rate or Concentration

Contaminant	Rate or Concentration

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

Yes No

Contaminant

Rate or Concentration

Contaminant	Rate or Concentration

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

Contaminant

Rate or Concentration

Contaminant	Rate or Concentration

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

1. Control Device/System:

2. Operating Principles:

3. Efficiency:*

4. Capital Costs:

*Explain method of determining

5. Useful Life:

6. Operating Costs:

7. Energy:

8. Maintenance Cost:

9. Emissions:

Contaminant	Rate or Concentration

10. Stack Parameters

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

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

1.

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

2.

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

¹Explain method of determining efficiency.

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

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

3.

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

4.

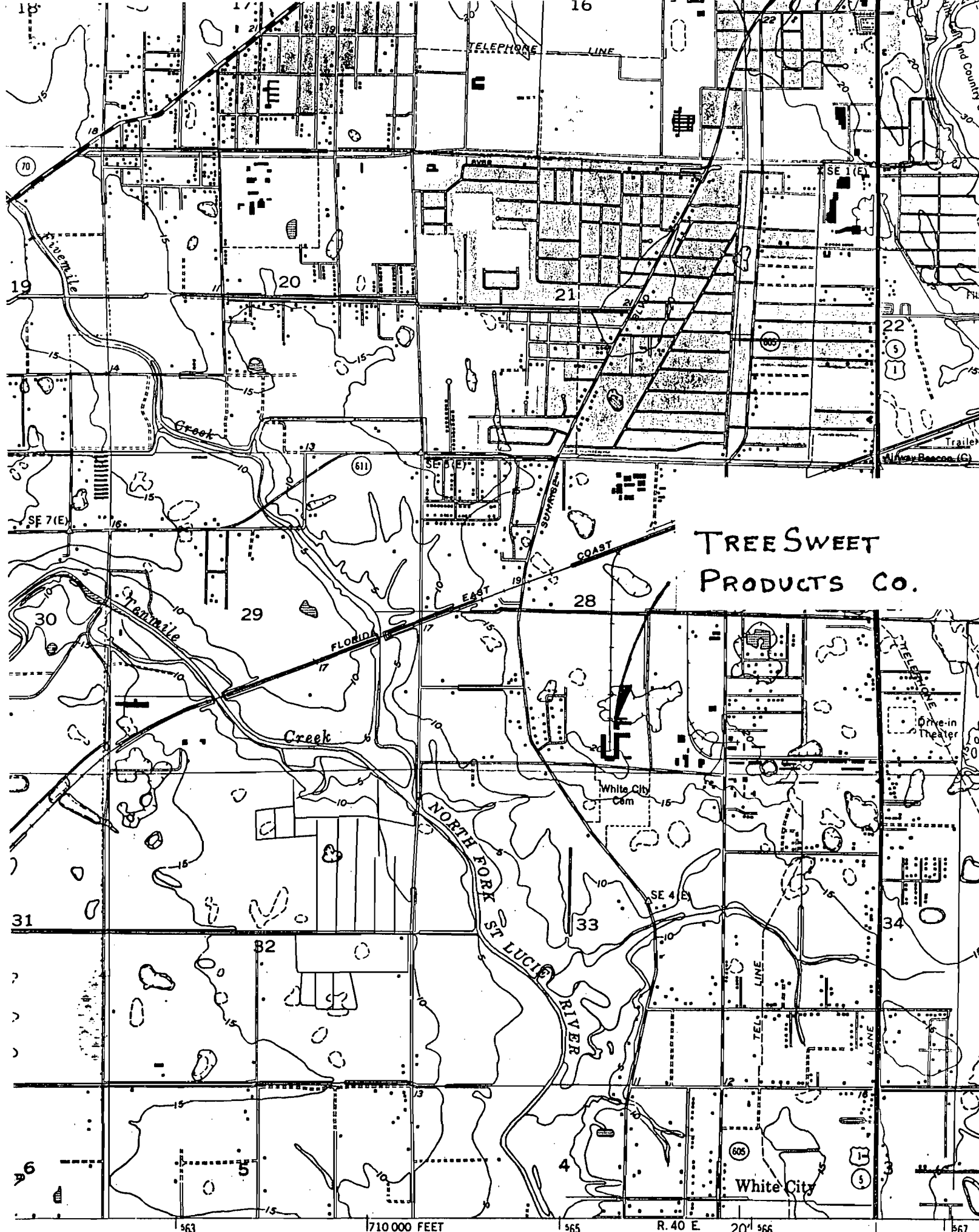
- a. Control Device:
- b. Operating Principles:
- c. Efficiency:¹
- d. Capital Costs:
- e. Useful Life:
- f. Operating Cost:
- g. Energy:²
- h. Maintenance Cost:
- i. Availability of construction materials and process chemicals:
- j. Applicability to manufacturing processes:
- k. Ability to construct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

F. Describe the control technology selected:

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

¹Explain method of determining efficiency.

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



TREE SWEET
PRODUCTS CO.

White City
Com

White City

563 710 000 FEET 565 R. 40 E. 20' 566 567

by the U. S. Coast & Geodetic Survey
and published by the Geological Survey

STUART 14 MI.
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**GULF COAST ENGINEERING COMPANY
CONSULTING ENGINEERS**

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TELEPHONE: (813) 685-9727 • 685-0085

Job no. _____

description _____

Tree Sweet Products

computed by WLT

date 3-12-86

sheet 2

of 2

checked by _____

date _____

Boilers #3 & #4

Uncontrolled Emissions

Particulates	@	28 #/10 ³ gal	@	276 gph	=	77 #/hr
Sulfur Dioxide	@	393 #/10 ³ gal	@	276 gph	=	108 #/hr
Carbon Monoxide	@	5 #/10 ³ gal	@	276 gph	=	1.38 #/hr
Hydrocarbons	@	1 #/10 ³ gal	@	276 gph	=	.28 #/hr
Nitrogen Oxides	@	120 #/10 ³ gal	@	276 gph	=	33 #/hr

Emissions are calculated using table 1.3-11 AP-42

Annual emissions are based on 5616 Hours of operation
 Potential emissions are based on 8760 Hours of operation

Actual Emissions

Particulates	@	28 #/10 ³ gal	@	110 gph	=	31 #/hr
Sulfur Dioxide	@	393 #/10 ³ gal	@	110 gph	=	43 #/hr
Carbon Monoxide	@	5 #/10 ³ gal	@	110 gph	=	.55 #/hr
Hydro Carbon	@	1 #/10 ³ gal	@	110 gph	=	.10 #/hr
Nitrogen Oxides	@	120 #/10 ³ gal	@	110 gph	=	13 #/hr