Osceola Farms Company
Osceola Farms

Facility ID No. 0990019
Palm Beach County

Title V Air Operation Permit Renewal

Permit No. 0990019-012-AV
(Renewal of Title V Air Operation Permit No. 0990019-008-AV)

Permitting Authority:

State of Florida
Department of Environmental Protection
Engineering/Permitting
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Title V Air Operation Permit Renewal

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Table of Contents

Section **Page Number**

I. Facility Information.
- A. Facility Description. 2
- B. Summary of Emissions Units. 2
- C. Applicable Regulations. 2

II. Facility-wide Conditions. 4

III. Emissions Units and Conditions.
- A. Mill Boilers Nos. 2, 4, 5. 7
- B. Mill Boilers Nos. 3, 6. 13
- C. Lime Storage Silo. 20
- D. Bagasse Handling System (Sugarcane Processing Facility). 21
- E. Emergency Reciprocating Internal Combustion Engine (RICE)..... 22

IV. Appendices. 26
- Appendix A, Glossary.
- Appendix CAM, Compliance Assurance Monitoring Plan.
- Appendix I, List of Insignificant Emissions Units and/or Activities.
- Appendix NESHAP, Subpart A – General Provisions.
- Appendix NESHAP, DDDDD - National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters.
- Appendix NESHAP, ZZZZ – National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.
- Appendix OMP-003, Operation and Maintenance Plan, Mill Boiler No. 3.
- Appendix OMP-006, Operation and Maintenance Plan, Mill Boiler No. 6.
- Appendix RBL, RACT, BACT and LAER Determinations.
- Appendix RR, Facility-wide Reporting Requirements.
- Appendix SSP, Startup/Shutdown Procedures for Boilers 2, 3, 4, 5, 6.
- Appendix TR, Facility-wide Testing Requirements.
- Appendix TV, Title V General Conditions.
- Appendix U, List of Unregulated Emissions Units and/or Activities.
- Appendix Wood, Authority to Burn Wood Chip Fuel.

V. Attachments
- Figure 1, Summary Report - Gaseous and Opacity Excess Emission and Monitoring System Performance
- Table H, Permit History.

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

SOUTH DISTRICT
P.O. BOX 2549
FORT MYERS, FL 33902-2549

RICK SCOTT
GOVERNOR

HERSCHEL T. VINYARD JR.
SECRETARY

PROPOSED PERMIT

PERMITTEE:
Osceola Farms Company
P.O. Box 679
Pahokee, Florida 33476

Permit No. 0990019-012-AV
Osceola Farms
Facility Id No. 0990019
Title V Air Operation Permit Renewal

The purpose of this permit is to renew the Title V air operation permit for the above referenced facility. The existing Osceola Farms facility is located in Palm Beach County at U.S. 98 and Hatton Highway, Pahokee, Florida. UTM Coordinates: Zone 17, 544.200 km East and 2968.000 km North; and Latitude: 26° 49' 45" North and Longitude: 80° 33' 00" West.

The Title V air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, 62-213. The above named permittee is hereby authorized to operate the facility in accordance with the terms and conditions of this permit.

Effective Date: DATE, 20xx
Renewal Application Due Date: Exp. DATE -225, 20xx
Expiration Date: Eff. DATE + 5 years, 20xx

(Proposed)

_____ _____

Jon M. Iglehart
Director of
District Management

Date

JMI/SRM/mf

SECTION I. FACILITY INFORMATION.

Subsection A. Facility Description.

The facility consists of a sugar mill and boiling house. The facility processes sugarcane. The existing facility consists of the following emissions units: five boilers, a lime silo, bagasse handling and storage, and two emergency reciprocating internal combustion engines. The facility is classified as a major VOC and NO_X emitting facility and subject to the Reasonably Available Control Technology (RACT) requirements of Rule 62-296.570, F.A.C. for the existing sugar mill boilers. The facility is subject to the following federal regulations: Title 40 Code of Federal Regulations Part 63 Subparts A, ZZZZ and DDDDD, General Provisions, National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines and National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters, respectively.

The facility is classified as a modified-major source under the Prevention of Significant Deterioration (PSD) and New Source Review for Non-Attainment Area (NSR-NAA) programs. The facility includes existing, modified and new emissions units having undergone PSD review. The facility is a major source of air pollution under the category "Fossil fuel fired boilers (or combinations thereof) totaling more than 250 million Btu/hour (MMBtu/hr) of heat input" per Rule 62-210.200(194), F.A.C.

This permit includes miscellaneous insignificant and unregulated emissions units and/or activities.

The facility is subject to a Compliance Assurance Monitoring (CAM) Plan.

Subsection B. Summary of Emissions Units.

EU No.	Brief Description
Regulated Emissions Units	
002	Mill Boiler No. 2
003	Mill Boiler No. 3
004	Mill Boiler No. 4
005	Mill Boiler No. 5
006	Mill Boiler No. 6
007	Lime Silo
009	Bagasse Handling and Storage Operations (Sugarcane Processing Facility)
010	Emergency Reciprocating Internal Combustion Engine (RICE) – Fire Pump AG Shop
011	Emergency RICE – Sugar Mill Generator
Unregulated Emissions Units and Activities	
025	Surface Coating Operations

Subsection C. Applicable Regulations.

Based on the Title V air operation permit renewal application received September 4, 2012, this facility is a major source of hazardous air pollutants (HAP). Because this facility operates stationary reciprocating internal combustion engines, it is subject to regulation under 40 CFR 63, Subpart ZZZZ, - National Emissions Standards For Hazardous Air Pollutants For Stationary Reciprocating Internal Combustion Engines. The existing facility is a PSD major source of air pollutants in accordance with Rule 62-212.400, F.A.C. A summary of applicable regulations is shown in the following table.

Regulation	EU No(s).
40 CFR 63, Subpart A	002, 003, 004, 005, 006, 010, 011
40 CFR 63, Subpart DDDDD	002, 003, 004, 005, 006

40 CFR 63, Subpart ZZZZ	010, 011
62-213.440	002, 003, 004, 005, 006, 007, 009, 010, 011
62-296.320	002, 003, 004, 005, 006, 007, 009, 010, 011
62-210.200	002, 003, 004, 005, 006, 007, 009, 010, 011
62-210.370	002, 003, 004, 005, 006, 007, 009, 010, 011
62-213.205	002, 003, 004, 005, 006, 007, 009, 010, 011
62-210.700	002, 003, 004, 005, 006, 007, 009, 010, 011
62-213.410	002, 003, 004, 005, 006
62-297.310	002, 003, 004, 005, 006, 007, 009
62-296.410	002, 003, 004, 005, 006
62-210.300	002, 003, 004, 005, 006, 007, 009, 010, 011

The following conditions apply facility-wide to all emission units and activities:

FW1. Appendices. The permittee shall comply with all documents identified in Section IV, Appendices, listed in the Table of Contents. Each document is an enforceable part of this permit unless otherwise indicated. [Rule 62-213.440, F.A.C.]

Emissions and Controls

FW2. Not federally Enforceable. Objectionable Odor Prohibited. No person shall cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An "objectionable odor" means 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. [Rule 62-296.320(2) and 62-210.200(Definitions), F.A.C.]

FW3. General Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) Emissions. The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems deemed-necessary and ordered by the Department. [Rule 62-296.320(1), F.A.C.]

{Permitting Note: Nothing is deemed necessary and ordered at this time.}

FW4. General Visible Emissions. No person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity equal to or greater than 20 percent opacity. EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C. This regulation does not impose a specific testing requirement. [Rule 62-296.320(4)(b)1, F.A.C.]

FW5. Unconfined Particulate Matter. No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any activity, including vehicular movement; transportation of materials; construction; alteration; demolition or wrecking; or industrially related activities such as loading, unloading, storing or handling; without taking reasonable precautions to prevent such emissions. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility include:

a. The use of covered conveyors on the carbonaceous fuel handling systems.
b. The use of enclosed material transfer points where feasible.
c. Minimization of the distance carbonaceous fuel is dropped during handling.
d. The use of windbreaks around the material handling equipment.
e. The use of water to control boiler ash dust during disposal.
f. Maintenance of paved areas as needed.

[Rule 62-296.320(4)(c), F.A.C.; PSD-FL-134/AC50-144971; and, proposed by applicant in Title V air operation permit application received September 4, 2012.]

Annual Reports and Fees

See Appendix RR, Facility-wide Reporting Requirements for additional details.

FW6. Annual Operating Report. The permittee shall submit an annual report that summarizes the actual operating rates and emissions from this facility. Annual operating reports shall be submitted to the Compliance Authority by April 1st of each year. [Rule 62-210.370(3), F.A.C.]

FW7. Annual Emissions Fee Form and Fee. The annual Title V emissions fees are due (postmarked) by March 1st of each year. The completed form and calculated fee shall be submitted to Major Air Pollution Source Annual Emissions Fee, P.O. Box 3070, Tallahassee, Florida 32315-3070. The forms are available for download by accessing the Title V Annual Emissions Fee On-line Information Center at the following Internet web site: http://www.dep.state.fl.us/air/emission/tvfee.htm. [Rule 62-213.205, F.A.C.]

FW8. Annual Statement of Compliance. The permittee shall submit an annual statement of compliance to the compliance authority at the address shown on the cover of this permit within 60 days after the end of each

calendar year during which the Title V permit was effective. [Rules 62-213.440(3)(a)2. & 3. and (3)(b), F.A.C.]

FW9. Prevention of Accidental Releases (Section 112(r) of CAA). If and when the facility becomes subject to 112(r), the permittee shall:

a. Submit its Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center. Any Risk Management Plans, original submittals, revisions or updates to submittals, should be sent to: RMP Reporting Center, Post Office Box 10162, Fairfax, VA 22038, Telephone: (703) 227-7650.
b. Submit to the permitting authority Title V certification forms or a compliance schedule in accordance with Rule 62-213.440(2), F.A.C.

[40 CFR 68]

FW10. Excess Emissions Requirements.
Rule 62-210.700 (Excess Emissions), F.A.C. cannot vary any requirement of an NSPS, NESHAP or Acid Rain program provision.

a. Excess emissions resulting from startup, shutdown or malfunction of any emission unit shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration**.** Excess emissions during startup and shutdown shall not exceed the specified startup and shutdown time periods in the respective boiler's start-up and shutdown procedures described in Appendix SSP, Startup/Shutdown Procedures for Boilers 2, 3, 4, 5, 6. The owner or operator shall take all precautions to minimize the magnitude and duration of excess emissions during startup and shutdown. [Rule 62-210.700(1), F.A.C.; Permit No. PSD-FL-134/AC50-144971/AC50-144972, as amended 7/22/91]

   {Permitting Note: Excess emissions during start-up and shutdown are authorized by the Department as described in Appendix SSP, Startup/Shutdown Procedures for Boilers 2, 3, 4, 5, 6.}

b. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown, or malfunction shall be prohibited. [Rule 62-210.700(4), F.A.C.]

c. In the case of excess emissions resulting from malfunctions, each owner or operator shall notify the Compliance Authority in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted to the Compliance Authority in a quarterly report, if requested by the Permitting or Compliance Authority. [Rule 62-210.700(6), F.A.C.]

FW11. Facility-Wide Recordkeeping and Monitoring Requirements. The following facility-wide recordkeeping and monitoring requirements apply:

a. The permittee shall generate a daily operations report for each day that a regulated emissions unit operates. The daily operations report shall be formatted to address the various facility wide restrictions identified in Specific Condition No. **FW12**.
b. The permittee shall monitor and record the daily steam production rates of the sugar mill boilers (24-hour block total, 8:00 a.m. to 8:00 a.m.) for each day of operation.
c. The permittee shall monitor and record the fuel oil consumption rates for the sugar mill boilers on a daily basis for each day of operation, in order to demonstrate compliance with Specific Condition **FW12.a.**

[Rule 62-213.440(1)(b), F.A.C.]

FW12. Facility-Wide Operating Restrictions. The following multi-unit operating restrictions apply to Emissions Units EU-002, EU-003, EU-004, EU-005, and EU-006:

a. Total No. 6 fuel oil consumption for all boilers shall not exceed 1,900 gallons per hour, 24,000 gallons per day (maximum), or 7,500 gallons per day (season average). [PSD-FL-134/AC50-144971 & AC50-144972]

b. Total steam production from all boilers shall not exceed 17,280,000 pounds per 24-hour period (block total, 8:00 a.m. to 8:00 a.m.). [PSD-FL-134/AC50-144971 &AC50-144972]

FW13. Facility-Wide Reporting Requirements.

a. *Start of Crop Season*. The owner or operator shall notify the Department when the crop season begins.

b. *Crop Season Records and Reporting*. A copy of the records for each crop season shall be sent to the Department's South District and EPA Region IV within 14 days of the end of each crop season for determination of compliance with Specific Condition **FW12.b**. Any exceedance of the limitation in condition **FW12.b**. shall be reported to the Department and EPA Region IV within 10 after the occurrence to the exceedance. [PSD-FL-134/AC50-144971/AC50-144971]

Subsection A. Boiler Nos. 2, 4 and 5

The specific conditions in this section apply to the following emissions units:

EU No.	Brief Description
002	Mill Boiler No. 2 This emissions unit is an inclined grate 280 MMBtu/hr boiler. The maximum steam capacity is 140,000 lbs/hr. Two wet impingement scrubbers (Joy Turbulaire Type D-48) control particulate matter emissions. Each scrubber exhausts through a separate 90' stack. Each stack's actual volumetric flow rate is 48,000 acfm, the exit diameter is 5 feet and the exit temperature is 156 °F. This boiler's initial start up date was 10/01/65.
004	Mill Boiler No. 4 Boiler No. 4, is a horseshoe 280 MMBtu/hr boiler. The maximum steam capacity is 140,000 lb/hr. Two single stack wet impingement scrubbers (Joy Turbulaire Type D-48) control particulate matter emissions. The two scrubbers exhaust through a common 90' stack. The stack's actual volumetric flow rate is 101,000 acfm and the exit temperature is 154 °F. The initial startup date was 10/31/62.
005	Mill Boiler No. 5 Boiler No. 5, is a horseshoe 330 MMBtu/hr boiler. The maximum steam capacity is 165,000 lbs/hr. Two wet impingement scrubbers (Joy Turbulaire Type D-40) control particulate matter emissions. Each scrubber exhausts to a separate 90' stack. The actual volumetric flow rate is 55,000 acfm for the west stack and 63,000 acfm for the east stack. The stacks' exit diameter is 5 feet and exit temperature is 150 °F. The start up date for the boiler was 11/1/1978.

{*Permitting Note: Boilers EU002, EU004 and EU005 have not been reviewed under the PSD Program for particulate matter (PM), sulfur dioxide (SO_2), nitrogen oxides (NO_X), volatile organic compounds (VOC), and carbon monoxide (CO). As a major source of VOC and NO_X, Boilers EU002, EU004 and EU005 are subject to the RACT requirements of Rule 62-296.570, F.A.C. For Boilers EU002, EU004 and EU005, the permittee has requested and received VOC and NO_X emission limits lower than the applicable regulation. Boilers EU002 and EU004 are classified as an existing unit under Rule 62-296.410, F.A.C., Carbonaceous Fuel Burners. Boiler EU005 is classified as a new unit under Rule 62-296.410, F.A.C., Carbonaceous Fuel Burners. These boilers are subject to 40 CFR 63 Subpart DDDDD. The boilers must comply with Subpart DDDDD regulations no later than January 31, 2016.*}

Essential Potential to Emit (PTE) Parameters

A.1. Permitted Capacity. The permitted capacity for these emission units is as follows:

EU ID No.	Maximum steam production pounds per hour (lbs/hr)	Pressure (psig)	Temperature (° F)	Averaging Period	Permit No. Reference
002	140,000	350	575	24-hour	AC50-112851, Department letter authorization dated 8/17/1990
004	140,000	-----	-----	24-hour	AC50-112851
005	165,000	-----	-----	24-hour	AC50-112851

[Rules 62-4.160(2), 62-204.800, 62-210.200(PTE), F.A.C.; and, Permit Nos. AC50-112851 and A050-165626]

A.2. Methods of Operation.

a. *Fuels.* The fuels that are allowed to be burned in these units are:

i. Bagasse,

ii. Blended No. 6 fuel oil,

iii. Clean wood chip fuel only as authorized in Appendix Wood-001, and

iv. Additional startup fuels: firewood, lumber and diesel fuel only as authorized in Appendix SSP.

[Rule 62-213.410, F.A.C.; Permit Nos. AO50-2049, AO50-7261, AO50-203679, amended 5/24/94, AO50-203680, amended 5/24/94, AO50-165626, amended 5/24/94]

A.3. Hours of Operation. The boilers shall not operate commercially during the period from May 1 through October 1. Each boiler is limited to 160 days (3840 hours) of operation during the season. [Permit Nos. AO50-120592, amended 11/18/88, AO50-203680, and A050-165626; Rule 62-210.200(PTE), F.A.C.]

A.4. Emissions Unit Operating Rate Limitation After Testing. See the related testing provisions in Appendix TR, Facility-wide Testing Requirements. [Rule 62-297.310(2), F.A.C.]

A.5. Fuel Flow Meters. The permittee shall install an integrating fuel flow meter for each boiler that shall be properly maintained and functional at all times, except during instrument breakdown, calibration or repair. [Permit Nos. AO50-203679, AC50-2052A, AO50-165626]

Control Technology

A.6. Control Equipment Monitoring Instrumentation. The scrubber control system shall be equipped with instrumentation to monitor water flow, total pressure drop and inlet water pressure. Such instrumentation shall be properly maintained so as to be functional at all times. [Permit Nos. AO50-120592, AO50-203680, AO50-165626]

A.7. Water Flow Meters. The permittee shall equip each wet scrubbing system for Boiler Nos. 2, 4 and 5 with two water flow meters: one to measure the total water flow rate to both scrubbers, and one to measure water flow rate to one individual scrubber. The water flow rate to the second scrubber shall be obtained by calculating the difference between the two meters. The monitoring shall be in accordance with the CAM plan. [Permit No. 0990019-010-AV]

Emission Limitations and Standards

Unless otherwise specified, the averaging times for Specific Conditions **A.8.-A.11**. are based on the specified averaging time of the applicable test method.

A.8. Particulate Matter (PM).

a. *EU002*. PM emissions from emission unit EU002 shall not exceed 0.2 lbs/MMBtu when burning bagasse fuel and 0.1 lbs/MMBtu when burning fuel oil.

i. In the event that both fuels are burned concurrently, the allowable PM emissions shall be prorated from the allowable standards for each fuel by their respective heat inputs.

[Permit No. PSD-FL-134/AC50-144971]

b. *EU004*. PM emissions from emission unit EU004 shall not exceed 0.3 lbs/MMBtu when burning carbonaceous fuel and 0.1 lbs/MMBtu when burning fossil fuel. [Permit No. AO50-203680 and Rule 62-296.410(1)(b), F.A.C.]

c. *EU005*. PM emissions from emission unit EU005 shall not exceed 0.2 lbs/MMBtu when burning carbonaceous fuel and 0.1 lbs/MMBtu when burning fossil fuel. [Permit No. AO50-165626]

A.9. Volatile Organic Compounds (VOC). VOC emissions from each emissions unit shall not exceed 1.5 lbs/MMbtu. [Permit Nos. AC50-2049A, amended 4/27/98, AC50-4770, amended 4/27/98 and AC50-5052, amended 4/27/98]

A.10. Nitrogen Oxides (NO_X). NO_X emissions from each emissions unit shall not exceed 0.45 lbs/MMBtu. [Permit Nos. AC50-2049A, amended 4/27/98, AC50-2052A, amended 4/27/98 and AC50-4770, amended 4/27/98]

A.11. Visible Emissions (VE):

a. *EU002*. VE shall not exceed 20% opacity except that 40% opacity is allowed for two minutes in any one hour. [Permit Nos. PSD-FL-134/AC50-144971]

b. *EU004 and EU005*. VE shall not exceed 30% opacity except that 40% opacity is allowed for two minutes in any one hour. [Permit Nos. AO50-203680 and AO50-165626; Rules 62-296.410(1)(b)1., and 62-296.410(2)(b)1, F.A.C.]

A.12. Fuel Oil Sulfur Content: The permittee shall not allow the firing of fuel oil with a sulfur content greater than 2.4% by weight nor allow the sulfur content of any fuel purchased for the unit to exceed 2.4% by weight. [Permit No. AC50-112851]

Excess Emissions

See Facility Wide condition Condition **FW10**.

Monitoring of Operations

A.13. CAM Plan. The permittee shall comply with the following CAM plan for each boiler. In addition, the permittee shall comply with the general Compliance Assurance Monitoring (CAM) requirements contained in the attached Appendix CAM. Failure to adhere to the monitoring requirements specified does not necessarily indicate an exceedance of a specific emissions limitation; however, it may constitute good reason to require compliance testing pursuant to Rule 62-297.310(7)(b), F.A.C. [40 CFR 64; Rules 62-204.800 and 62-213.440(1)(b)1.a., F.A.C.]

	Indicator No. 1	**Indicator No. 2**
Indicator	**Pressure drop** across each scrubber.	**Water flow rate** to each scrubber.
Indicator Range	An excursion is defined as any pressure drop outside the following range: **Boiler No. 2** South Scrubber: <5.4 or >12.6 in. H2O North Scrubber: <5.4 or >12.6 in. H2O **Boiler No. 4** North Scrubber: <9.9 or >18.0 in. H2O South Scrubber: <7.0 or >18.0 in. H2O **Boiler No. 5** West Scrubber: <7.2 or >13.0 in. H2O East Scrubber: <7.2 or >13.0 in. H2O Excursions trigger an inspection, corrective action, and a recordkeeping and reporting requirement.	An excursion is defined as any water flow rate outside the following range: **Boiler No. 2** South Scrubber: <330 gpm or >500 gpm North Scrubber: <330 gpm or >600 gpm **Boiler No. 4** North Scrubber: <240 gpm or >700 gpm South Scrubber: <200 gpm or >620 gpm **Boiler No. 5** West Scrubber: <250 gpm or >460 gpm East Scrubber: <280 gpm or >470 gpm Excursions trigger an inspection, action, and a recordkeeping and reporting requirement.
Monitoring Frequency	Pressure drop is monitored continuously.	Scrubber water flow rate is monitored continuously.
Data Collection Procedures	Eight (8)-hour block average obtained from continuous readings.	Eight (8)-hour block average obtained from continuous readings.
Averaging Period	8-hour block average*	8-hour block average*

*One working shift at the facility is 8 hours. The 8-hour block average shall coincide with the 8-hour working shift.

Test Methods and Procedures

A.14. Test Methods. Required tests shall be performed in accordance with the following reference methods:

Method	Description of Method and Comments
1-4	Traverse Points, Velocity and Flow Rate, Gas Analysis, and Moisture Content
5	Determination of Particulate Emissions from Stationary Sources
7	Determination of Nitrogen Oxide Emissions from Stationary Sources
7E	Determination of Nitrogen Oxide Emissions from Stationary Sources
9	Visual Determination of the Opacity of Emissions from Stationary Sources
18	Measurement of Gaseous Organic Compound Emissions by Gas Chromatography
25	Determination of Total Gaseous Nonmethane Organic Emissions as Carbon
25A	Method for Determining Gaseous Organic Concentrations (Flame Ionization)

The above methods are described in 40 CFR 60, Appendix A, and adopted by reference in Rule 62-204.800, F.A.C. No other methods may be used unless prior written approval is received from the Department. [62-297.401, F.A.C.]

A.15. Common Testing Requirements. Unless otherwise specified, tests shall be conducted in accordance with the requirements and procedures specified in Appendix TR, Facility-Wide Testing Requirements, of this permit. [Rule 62-297.310, F.A.C.]

A.16. Annual Compliance Tests Required. During each federal fiscal year (October 1st to September 30th), EU002, EU004 and EU005 shall be tested to demonstrate compliance with the emissions standards for **VE**, **PM**, **VOC** and **NO_X**. [Rule 62-297.310(7), F.A.C.; Permit Nos. PSD-FL-134/AC50-144971, AC50-2049A, AC50-2052A, AC50-4770A, AO50-5987, AO50-203680 and AO50-165626]

A.17. Compliance Tests Prior To Renewal. Compliance tests for EU002, EU004 and EU005 shall be performed for **VE, PM**, **VOC** and **NO_X** once every 5 years. The tests shall occur prior to obtaining a renewed operating permit to demonstrate compliance with the emission limits in Specific Conditions **A.8. – A.11.** [Rules 62-210.300(2)(a) and 62-297.310(7)(a), F.A.C.]

A.18. Visible Emissions (VE): The test method for VE shall be EPA Reference Method 9 as described in 40 CFR 60 Appendix A. Test procedures shall meet all applicable requirements of Chapter 62-297, F.A.C. [Permit Nos. PSD-FL-134/AC50-144971, AO50-203680 and AO50-165626, Rules 62-296.410(3)(a), F.A.C. and 62-296.410(3)(c), F.A.C.]

A.19. Particulate Matter (PM). Compliance with PM standards shall be determined by EPA Reference Methods 1, 2, 3, 4 and 5, described in 40 CFR 60, Appendix A. The compliance test results shall be calculated by assuming the thermal efficiency of the boiler is 55 percent for bagasse. Test procedures shall meet all applicable requirements of Chapter 62-297, F.A.C. During each compliance test for PM, the permittee shall record the pressure drop across each scrubber and the water flow rate to each scrubber at least every 15 minutes. [Permit Nos. PSD-FL-134/AC50-144971, AO50-203680, and AO50-165626, Rules 62-296.410(3)(b), F.A.C. and 62-296.410(3)(c), F.A.C.]

A.20. Volatile Organic Compounds (VOC): Compliance with VOC emission standards shall be determined by EPA Method 25, or 25A modified to incorporate a dilution system as approved by the Department under the provisions of Rule 62-297.620, F.A.C. If EPA Method 25A is employed, EPA Reference Method 18 may be used to quantify and subtract the methane fraction in the exhaust gases. Methods 25, 25A and 18 are described in 40 CFR 60, Appendix A. [Permit Nos. AC50-2049/AO50-203679, as amended 4/27/98, AC5052A/AO50-203680, amended 4/27/98, AC50-4770/AO50-165626, amended 4/27/98]

A.21. Nitrogen Oxides (NO_X): Compliance with NO_X emission standards shall be determined by EPA Method 7, or 7E. Methods 7 and 7E are described in 40 CFR 60, Appendix A. [Permit Nos. AC50-2049/AO50-

203679, as amended 4/27/98, AC50-5052A/AO50-203680, amended 4/27/98, AC50-4770/AO50-165626, amended 4/27/98]

A.22. Fuel Oil Sulfur Content: The permittee may determine compliance with the sulfur content limitation based on a certification from the fuel supplier or based on fuel analysis. The certification must include the following at the minimum:

a. *Fuel Oil Supplier*: Name, address and phone number;
b. *Fuel Oil Sulfur Content*: Sulfur content and method of analysis; and
c. *Fuel Oil Heat Content*: Heat and method of analysis.

If the permittee chooses to demonstrate compliance based sampling and analysis of sulfur in fuel oil from the common tank, the tests performed shall using ASTM D129-91, ASTM D2662-94 or ASTM D4294-90. [Rule 62-4.070(3), F.A.C.]

A.23. Stack Testing **(Applies to EU002 and EU005 Only).**

Each of the two individual exhaust stacks on each of the two scrubbers associated with Boiler No. 2 and each of the individual exhaust stacks on each of the two scrubbers associated with Boiler No. 5 are authorized to be independently (on separate days) tested for purposes of demonstrating compliance with permitted emissions limits. The stack test for the emissions unit's second exhaust stack shall begin within three days of the completion of the first exhaust stack's stack test, unless inclement weather, operational problems or other unforeseen or uncontrollable circumstances preclude such testing. If the second exhaust stack's stack test is not able to be tested within three days of the completion after the first exhaust stack's stack test due to inclement weather, operational problems or other unforeseen or uncontrollable circumstances, the facility shall notify the compliance authority. The notification shall include a description of the circumstance preventing the second stack test from being performed within three days of the first stack test and date of rescheduled testing.

a. Each exhaust stack shall be tested for PM, VOC and NO_X emissions.
b. The pollutant emissions results (average of three test runs) from each exhaust stack's test shall be added together for compliance demonstration reporting.
c. When Boiler No. 2 stack tests are performed over multiple days, the following shall apply:
    i. During the second and any subsequent days of testing either the South scrubber or the North scrubber, the steam flow achieved by Boiler No. 2 during the testing shall be within +15 percent of the steam flow achieved during the first day of testing for the boiler. The operating rate during testing shall comply with Rule 62-297.310(2), F.A.C. For purposes of determining compliance with Rule 62-297.310(2), the average steam flow rate for the boiler during all test runs conducted on the North and South scrubbers shall be the determining rate for subsequent boiler operation until a new test is conducted.
    ii. During the second and any subsequent days of testing either the South scrubber or the North scrubber, the pressure drop and water flow rate achieved by each scrubber (i.e., South or North scrubber) during the testing shall be within +15 percent of the scrubber minimum and maximum pressure drop and water flow rates achieved by each individual scrubber (South or North) during the test runs on the first day of testing, regardless of which scrubber stack is being tested.
d. When Boiler No. 5 stack tests are performed over multiple days, the following shall apply:
    i. During the second and any subsequent days of testing either the East scrubber or the West scrubber, the steam flow achieved by Boiler No. 5 during the testing shall be within +15 percent of the steam flow achieved during the first day of testing for the boiler. The operating rate during testing shall comply with Rule 62-297.310(2), F.A.C. For purposes of determining compliance with Rule 62-297.310(2), the average steam flow rate for the boiler during all test runs conducted on the East and West scrubbers shall be the determining rate for subsequent boiler operation until a new test is conducted.
    ii. During the second and any subsequent days of testing either the East scrubber or the West scrubber, the pressure drop and water flow rate achieved by each scrubber (i.e., East or West scrubber) during

the testing shall be within +15 percent of the scrubber minimum and maximum pressure drop and water flow rates achieved by each individual scrubber (East or West) during the test runs on the first day of testing, regardless of which scrubber stack is being tested.

[Permit No. 0990012-013-AC]

*{Permitting Note: If the facility is not able to meet condition **A.23.d. or A.23.e**. above, the facility is to submit in the test report the reasons why the operating parameters could not be maintained within 15% of the first test run during the first scrubber's stack test. The Department will review with discretion in determining acceptance of the test report.}*

Recordkeeping and Reporting Requirements

A.24. Other Reporting Requirements. See Appendix RR, Facility-Wide Reporting Requirements, for additional reporting requirements.

A.25. Recordkeeping Requirements: The owner or operator shall record and maintain a log of the following:

a. *Operating Parameters*. Steam production, temperature, and pressure. [Rule 213.440(1)(b), F.A.C.; PSD-FL-134/AC50-144971
b. *Operation Hours.* Daily hours of operation for each day of operation. [Rule 62-213.440(1)(b), F.A.C.; Permit Nos. AO50-203679, AO50-203680, and AO50-165626]
c. *Fuel Usage.* Daily fuel oil consumption. [Permit No. AC50-112851]
d. *Fuel oil sulfur analysis:* Supplier certification records and analysis of fuel oil from common tank. [Rule 62-4.070(3), F.A.C.]

A.26. Annual Operating Reports (AORs). The AORs shall include the following:

a. *Material/fuel Usage*. The amount of materials/fuels utilized (AO50-2049A),
b. *Wood Chip Usage*. Annual quantity of wood chips burned, and
c. *Capacity Factor*. Annual capacity factor for wood chip fuel.

[Permit Nos. AO50-203679, amended 5/24/94, AO50-203680, amended 5/24/94, and AO50-165626, amended 5/24/94]

Other Requirements

A.27. Federal Rule Requirements. In addition to the specific conditions listed above, these emissions units are also subject to the requirements contained in 40 CFR 63, Subpart A – General Provisions and 40 CFR 63 Subpart DDDDD – National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters, and all subsequent final revisions of these subparts. [Rule 62-213.440, F.A.C.]

Subsection B. Boiler Nos. 3 and 6

The specific conditions in this section apply to the following emissions units:

EU No.	Brief Description
003	Mill Boiler No. 3 This emissions unit is an inclined grate 292 MMBtu/hr boiler fired by bagasse, No. 6 fuel oil, and wood chips. Particulate matter emissions from the unit are controlled by a single wet impingement scrubber (Joy Turbulaire Type D Size 90). The maximum steam capacity of the boiler is 150,000 lb/hr. The scrubber is vented through a single 90' stack with 91% control efficiency. The stack has an actual volumetric flow rate of 90,000 acfm, an exit diameter of 6.25 feet and an exit temperature of 147 °F. The initial start up date was 10/31/61.
006	Mill Boiler No. 6 This emissions unit is a traveling grate 379 MMBtu/hr boiler fired by bagasse, No. 6 fuel oil, and/or wood chips. Particulate matter emissions from the unit are controlled by a single wet impingement scrubber (Joy Turbulaire Type D Size 90). The scrubber exhausts through a single 90' stack with an actual volumetric flow rate of 101,000 acfm and an exit temperature of 151 °F.

{Permitting note(s):EU003 and EU006 have been reviewed under the PSD Program for particulate matter (PM), sulfur dioxide (SO_2), nitrogen oxides (NO_X), volatile organic compounds (VOC), and carbon monoxide (CO). As a modified major source of VOC and NO_X, the boilers are not subject to the RACT emission limiting standards of Rule 62-296.570, F.A.C. However, the boilers are subject to the federally enforceable Best Available Control Technology (BACT) and Lowest Achievable Emission Rate (LAER) emission limiting standards for NO_X and VOC, respectively. EU003 has been classified as an existing unit under Rule 62-296.410, F.A.C., Carbonaceous Fuel Burners. EU006 is classified a new unit under Rule 62-296.410, F.A.C., Carbonaceous Fuel Burners. These boilers are subject to 40 CFR 63 Subpart DDDDD. The boilers must comply with Subpart DDDDD regulations no later than January 31, 2016.}

Essential Potential to Emit (PTE) Parameters

B.1. Permitted Capacity. These emissions units shall not exceed the following:

EU ID	Maximum steam production (lbs/hr)	Heat input fuel oil (MMBtu /hr)	Total Heat Input (MMBtu /hr)	Pressure (psig)	Temperature (F)	Averaging Period	Permit No. Reference
003	150,000	-----	292*	350	575	1-hour	PSD-FL-134/AC50-144971
006	195,000	75.4	379**	350	575	1-hour	PSD-FL-134/AC50-144972

*assuming 55% boiler efficiency for bagasse. Approximately 35.5 TPH of wet bagasse will provide 292 MMBtu/hr.
** Approximately 46.1 TPH of wet bagasse will produce 379 MMBtu/hr.

Except during compliance tests, these boilers shall not be operated above the permitted capacity.

[Rules 62-4.160(2), 62-204.800, 62-210.200(PTE), F.A.C., Permit Nos. PSD-FL-134/AC50-144971/AC50-144972]

B.2. Methods of Operation.

a. *Fuels.* The fuels that are allowed to be burned in these units are:
   i. *Carbonaceous Fuels*:
      1. Bagasse, and

2. Clean wood chips (as authorized in Appendix Wood-001).

[AO50-165813, amended 7/26/94 and AO50-165814, amended 7/26/94]

ii. *Fossil Fuels:*

1. No. 6 fuel oil, and
2. Blended fuel oil from the common fuel oil system.
3. Any fuel oil burned in Boiler No. 3 shall be replaced, during the season it is burned, with fuel oil whose sulfur content shall not exceed 1.0 percent.
4. Additional startup fuels: firewood, lumber and diesel fuel (as authorized in Appendix SSP).

[Rule 62-213.410, F.A.C., Permit Nos. PSD-FL-134/AC50-144971 amended 2/15/93, PSD-FL-134/AC50-144972]

B.3. Hours of Operation. These boilers shall not operate commercially during the period from May 1 through October 1. These boilers are limited to 160 days (3840 hours) of operation during the season. A log shall be kept on each boiler to show compliance with this condition. [Permit Nos. PSD-FL-134/AC50-144971/144972; Rule 62-210.200(PTE), F.A.C.]

B.4. Operating Restrictions*:* Other than during start-up, shutdown, and malfunctions which must be recorded on the boiler operation logs, the permittee shall not operate Boiler No. 3 or Boiler No. 6 when the pressure drop across the scrubber is less than 7 inches of water, the feed water pressure to the scrubber is less than 30 psig and the feed water flow rate through the scrubber is less than 300 gallons per minute. These parameters may be changed by the Department if other parameters show compliance. [Permit No. PSD-FL-134/AC50-144971/AC50-144972]

B.5. Emissions Unit Operating Rate Limitation After Testing. See the related testing provisions in Appendix TR, Facility-wide Testing Requirements. [Rule 62-297.310(2), F.A.C.]

B.6. Combustion and Operating Practices. These emission units shall be operated in accordance with Appendix OMP-003 and Appendix OMP-006, Operation and Maintenance Plan, Mill Boiler No. 3 and Operation and Maintenance Plan, Mill Boiler No. 6. [Permit No. PSD-FL-134/AC50-144971/AC50-144972, BACT determination dated 10/17/1988]

Control Technology

B.7. Scrubber Instrumentation. The scrubber shall be equipped with the following:

a. *Manometer*. A manometer or equivalent instrument to measure the total pressure drop of the flue gas stream across the scrubber.
b. *Pressure gauges*. Pressure gauges to measure the water pressure at the spray nozzles,
c. *Flow meter*. A flow meter or equivalent device (weir) to measure the quantity of the water circulating through each scrubber.
d. *Nozzles*. "Quick-release" type nozzles.
e. *Water flow meter*. Each wet scrubber with its own dedicated water flow meter to measure the scrubber's water flow rate in accordance with the CAM Plan.

[Permit Nos. PSD-FL-134/AC50-144971/144972; Rule 62-4.070(3). F.A.C.]

B.8. Flow Meters. The emissions units shall be equipped with an integrating fuel oil flow meter. [Permit Nos. PSD-FL-134/AC50-144971, amended 2/15/93 and PSD-FL-134/AC50-144972]

B.9. Oxygen Measurement Device. The emissions units shall be equipped with a device to measure oxygen. [Permit Nos. PSD-FL-134/AC50-144971/144972]

Emission Limitations and Standards

Unless otherwise specified, the averaging times for Specific Conditions **B.10.-B.11**. are based on the specified averaging time of the applicable test method.

B.10. Emission Limits. The emission units shall not exceed the following pollutant emissions:

Pollutant	EU ID	Mass Emissions		Bagasse* (lbs/MMBtu)	No. 6 Fuel oil (lbs/MMBtu)	Rule Reference
		lbs/hr	TPY			
PM	003	58.4	112	0.2**	0.1	PSD-FL-134/AC50-144971/AC50-144972
	006	56.9	109	0.15**	0.10**	
VOC	003	71	136	0.25	0.002	PSD-FL-134/AC50-144971/144972, amend 7/22/91
	006	92.3	177	0.25	0.002	
NOX	003	64.6	96	0.16	0.4	PSD-FL-134/AC50-144971/144972, amend 7/22/91
	006	78.6	122	0.16	0.4	
CO	003	1022	1962	3.5	0.033	PSD-FL-134/AC50-144971/144972, amend 7/22/91
	006	2463.5	4730	6.5	0.033	
SO_2	003	244 (max)	78	0.24	2.35	PSD-FL-134/AC50-144971/144972, amend 7/22/91
	006	265 (max)	97	0.24	2.35	

*****assuming 55% efficiency

**in the event that both bagasse and residual No. 6 fuels are burned concurrently, the allowable PM emissions shall be prorated from the allowable standards for each fuel by their respective heat inputs.

B.11. Visible Emissions: The permittee shall not allow visible emissions that exceed 20% opacity except that 40% opacity is allowed for two minutes in any one hour. [Permit Nos. PSD-FL-134/AC50-144971/AC50-144972]

B.12. Annual Capacity Factor***. EU003 only*.** Annual capacity factor for fuel oil firing is limited to 10 percent (0.10) or less for Boiler No. 3. [PSD-FL-134/AC50-144971, amended 2/15/93]

Excess Emissions

See Facility Wide Condition **FW10**.

Monitoring of Operations

B.13. CAM Plan. The permittee shall comply with the following CAM plan for each boiler. In addition, the permittee shall comply with the general Compliance Assurance Monitoring (CAM) requirements contained in the attached Appendix CAM. Failure to adhere to the monitoring requirements specified does not necessarily indicate an exceedance of a specific emissions limitation; however, it may constitute good reason to require compliance testing pursuant to Rule 62-297.310(7)(b), F.A.C. [40 CFR 64; Rules 62-204.800 and 62-213.440(1)(b)1.a., F.A.C.]

	Indicator No. 1	Indicator No. 2
Indicator	**Pressure drop** across scrubber.	**Total water flow** rate to scrubber.
Indicator Range	An excursion is defined as any pressure drop outside the following range: **Boiler No. 3** <14.0 in. H2O or >21.0 in. H2O **Boiler No. 6** <11.2 in. H2O or >19.1 in. H2O Excursions trigger an inspection, corrective action, and a recordkeeping and reporting requirement.	An excursion is defined as any water flow rate outside the following range: **Boiler No. 3** <450 gpm or >880 gpm **Boiler No. 6** <550 gpm or >880 gpm Excursions trigger an inspection, corrective action, and a recordkeeping and reporting requirement.
Monitoring	Pressure drop is monitored continuously.	Scrubber water flow rate is monitored

Frequency		continuously.
Data Collection Procedures	Eight (8)-hour block average obtained from continuous readings.	Eight (8)-hour block average obtained from continuous readings.
Averaging Period	8-hour block average. *	8-hour block average.*

* One working shift at the facility is 8 hours. The 8-hour block average shall coincide with the 8-hour working shift.

B.14. Air Quality Control System: The permittee shall implement the following periodic monitoring requirements for Boiler No. 3 and Boiler No. 6's wet scrubbing systems to ensure compliance with condition **B.4** of this permit. [Rule 62-213.440(1)(b), F.A.C.]:

a. *Total Pressure Drop:* The permittee shall monitor and record the total pressure drop across each scrubber once per shift (every 8 hours) during each day of operation.
b. *Scrubber Water Pressure:* The permittee shall monitor and record the scrubber water inlet pressure to each scrubber at the nozzles a minimum of once per shift (every 8 hours) during each day of operation.
c. *Scrubber Water Flow:* The permittee shall monitor and record the scrubber water flow rate to each scrubber a minimum of once per shift (every 8 hours) during each day of operation.
d. *Scrubber Water Quality:* The scrubber water pH at the inlet and outlet shall be measured for each scrubber and recorded once per day during each day of operation.
e. *Scrubber Nozzles:* The permittee shall visually inspect the nozzles on each scrubber a minimum of once per day, checking for pluggage and water flow. The permittee shall record the results of all inspections and replace any plugged or defective nozzles within 24 hours of detection. The record shall include as a minimum the condition (plugged, cleaned, replaced, time of inspection, etc.) of the nozzle and location (I.D. No.).

[Rules 62-213.440(1)(b), F.A.C.; Permit No. PSD-FL-134/AC50-144971/AC50-144972]

{Permitting Note: In lieu of recording the total pressure drop and scrubber water flow once every eight hours, the total pressure drop and scrubber water flow will be continuously monitored and recorded as an eight hour block average. This recordkeeping will provide better reasonable assurance of continuous compliance with PM emissions limits and is reflective of the same data collection procedure and averaging period in the CAM plan.}

B.15. Emissions Unit Performance:

a. *Exhaust Gas Oxygen Monitor:* The boiler shall be equipped with a device to measure oxygen. The permittee shall monitor and record the oxygen content of the exhaust gases prior to the scrubber in accordance with Appendix OMP-003 and Appendix OMP-006, Operation and Maintenance Plan, Mill Boiler No. 3 and Operation and Maintenance Plan, Mill Boiler No. 6. Oxygen readings shall be taken two times per shift. The owner or operator shall operate the boiler in an O_2 range between 2 and 12% oxygen (one-hour average).
b. *Operation and Maintenance Plan:* The permittee shall maintain an Operations and Maintenance Plan (OMP). The boiler shall be operated and maintained in accordance with Appendix OMP-003 and Appendix OMP-006. The OMP plan shall consist of a range of appropriate excess O_2 levels.

[Permit No. PSD-FL-134/AC50-144971/AC50-144972]

Test Methods and Procedures

B.16. Test Methods. Required tests shall be performed in accordance with the following reference methods:

Method	Description of Method and Comments
1-4	Traverse Points, Velocity and Flow Rate, Gas Analysis, and Moisture Content
5	Determination of Particulate Emissions from Stationary Sources
6	Determination of Sulfur Dioxide Emissions from Stationary Sources
6A	Determination of Sulfur Dioxide, Moisture, and Carbon Dioxide Emissions From Fossil Fuel Combustion Sources
6B	Determination of Sulfur Dioxide and Carbon Dioxide Daily Average Emissions From Fossil Fuel Combustion Sources
6C	Determination of Sulfur Dioxide Emissions from Stationary Sources (Instrumental Analyzer Procedure)
7	Determination of Nitrogen Oxide Emissions from Stationary Sources
7A	Determination of Nitrogen Oxide Emissions from Stationary Sources – Ion Chromatographic Method
7E	Determination of Nitrogen Oxides Emissions From Stationary Sources (Instrumental Analyzer Procedure)
9	Visual Determination of the Opacity of Emissions from Stationary Sources
10	Determination of Carbon Monoxide Emissions from Stationary Sources {Note: The method shall be based on a continuous sampling train.}
25	Determination of Total Gaseous Nonmethane Organic Emissions as Carbon

The above methods are described in 40 CFR 60, Appendix A, and adopted by reference in Rule 62-204.800, F.A.C. No other methods may be used unless prior written approval is received from the Department. [Rule 62-297.401, F.A.C., Permit No. PSD-FL-134/AC50-144971/AC50-144972]

B.17. Common Testing Requirements. Unless otherwise specified, tests shall be conducted in accordance with the requirements and procedures specified in Appendix TR, Facility-Wide Testing Requirements, of this permit. [Rule 62-297.310, F.A.C.]

B.18. Annual Compliance Tests Required. During each federal fiscal year (October 1st to September 30th), EU003 and EU006 shall be tested to demonstrate compliance with the emissions standards for **VE** and **PM**. [Permit No. PSD-FL-134/AC50-144971/AC50-144972; Rule 62-297.310(7), F.A.C.]

{Permitting Note: CO, VOC and NO_X, emissions shall be minimized by operating the boilers in accordance with the Operation and Maintenance Plan (See Specific Condition B.15.b.}

B.19. Compliance Tests Prior To Renewal. Compliance tests shall be performed for **CO, VOC, NO_X, PM, SO_2** and **VE** once every 5 years. The tests shall occur prior to obtaining a renewed operating permit to demonstrate compliance with the emission limits in Specific Conditions **B.10. – B.11.** [Rules 62-210.300(2)(a) and 62-297.310(7)(a), F.A.C.]

{Permitting Note: Sulfur dioxide testing is required to show compliance with the BACT emission limiting standard for bagasse. Stack testing is only required for bagasse firing.}

B.20. Thermal Efficiency Testing: The permittee shall determine each emissions unit's actual thermal efficiency in accordance with the ASME short-form procedure prior to renewing the operation permit (every 5 years). The most recent report on the thermal efficiency test shall be included with the application for renewal of the operation permit. [Permit No. PSD-FL-134/AC50-144971/AC50-144972]

B.21. Visible Emissions and Particulate Matter:

a. *VE*. Compliance with VE standards shall be determined by EPA Method 9. [Permit No. PSD-FL-134/AC50-144971]

b. *PM*:

i. Compliance with PM standards shall be determined by EPA Methods 1, 2, 3, 4 and 5 described in 40 CFR 60, Appendix A (assuming a 55% efficiency).

ii. Compliance test results shall be calculated by assuming thermal efficiency of boiler is 55% for bagasse or by any new method subsequently adopted by Department rule.

iii. The permittee shall monitor and record the scrubber parameters (total pressure drop, water pressure, and water flow) every 15 minutes, or at the permittee's option, may continuously monitor these parameters during the particulate matter compliance tests . [Permit No. PSD-FL-134/AC50-144971/AC50-144972]

iv. For information purposes only, the PM emission rate shall also be calculated by utilizing both the F factor (for each compliance test) and the short term ASME boiler efficiency test results (once every five years.). [Permit No. PSD-FL-134/AC50-144971/AC50-144972]

c. *Simultaneous Testing:* The permittee shall determine visible emissions and particulate matter emissions concurrently. Under circumstances when this is not feasible, the permittee shall obtain prior approval from the Permitting Authority to conduct the tests at separate times. In such circumstances, the tests shall be conducted as close to each other as feasible. [Permit No. PSD-FL-134/AC50-144971/AC50-144972]

B.22. Volatile Organic Compounds: All volatile organic compound tests performed pursuant to the requirements of this permit shall be determined using EPA Methods 25. Any other method other than Method 25 must have Department approval. [Permit No. PSD-FL-134/AC50-144971/AC50-144972, as amended 7/22/91]

{*Permitting Note****:*** *Method 25A and Method 18 may be used if the criteria outlined in Department guidance memo DARM-OGG-2, Guidance on the Use of EPA Methods 18, 25 and 25A for Measuring Gas Stream Volatile Organic Compounds (VOC) Concentration and EPA Emission Measurement Center Guideline Document EMC GD-033, EPA's VOC Test Methods 25 and 25A, dated April 4, 1995 is met. According to this memo, Method 25A is allowed if the VOC concentration in the exhaust is 50 ppmv or less. The owner or operator is to submit a test protocol for Department approval demonstrating that the proposed alternate procedure is accurate to demonstrate compliance.}*

B.23. Nitrogen Oxides: All nitrogen oxides tests performed pursuant to the requirements of this permit shall be determined using EPA Methods 7, or 7E described in 40 CFR 60 Appendix A. [Permit No. PSD-FL-134/AC50-144971/AC50-144972, amended 7/22/91]

B.24. Carbon Monoxide: All carbon monoxide tests performed pursuant to the requirements of this permit shall be determined using EPA Method 10 in 40 CFR 60 Appendix A. [Permit No. PSD-FL-134/AC50-144971/AC50-144972, amended 7/22/91]

B.25. Sulfur Dioxide: All sulfur dioxide tests performed pursuant to the requirements of this permit shall be determined using EPA Methods 6, 6A, 6B or 6C in 40 CFR 60 Appendix A for Boiler No. 3 and EPA Methods 6, 6A-B in 40 CFR 60 Appendix A for Boiler No. 6. The permittee shall monitor and record the scrubber parameters (total pressure, water pressure and water flow) drop every 15 minutes, or at the permittee's option, may continuously monitor for these parameters during the sulfur dioxide compliance tests. [Permit No. PSD-FL-134/AC50-144971/AC50-144972 and amended 7/22/91]

B.26. Fuel Oil Sulfur Content: The permittee may determine compliance with the sulfur content limitation based on a certification from the fuel supplier or based on fuel analysis. The certification must include the following at the minimum:

a. *Fuel Oil Supplier*: Name, address and phone number;
b. *Fuel Oil Sulfur Content*: Sulfur content and method of analysis; and
c. *Fuel Oil Heat Content*: Heat and method of analysis.

If the permittee chooses to demonstrate compliance based sampling and analysis of sulfur in fuel oil from the common tank, the tests performed shall using ASTM D129-91, ASTM D2662-94 or ASTM D4294-90. [Rule 62-4.070(3), F.A.C.]

Recordkeeping and Reporting Requirements

B.27. Other Reporting Requirements. See Appendix RR, Facility-Wide Reporting Requirements, for additional reporting requirements.

B.28. Recordkeeping Requirements. The owner or operator shall maintain the following logs:

a. *Steam Production*: The permittee shall maintain a daily log of steam production, steam pressure, and temperature for each day of operation. [Permit No. PSD-FL-134/AC50-144971/AC50-144972]
b. *Fuel Oil Usage:* The permittee shall maintain a log of the fuel oil consumption to show compliance with Specific Condition **B.1.** [Permit No. PSD-FL-134/AC50-144971, amended 2/15/93 and PSD-FL-134/AC50-144972]
c. *Fuel Oil Sulfur Content:* The permittee shall maintain invoices of the fuel oil purchased for this boiler that lists the sulfur content to show compliance with Specific Condition **B.2.a.ii.3.**. [Permit No. PSD-FL-134/AC50-144971, amended 2/15/93 and PSD-FL-134/AC50-144972]
d. *Hours of Operation*: The permittee shall log the hours of operation for each day of operation. [Permit No. PSD-FL-134/AC50-144971/AC50-144972]

B.29. Annual Operating Report. The AOR shall include the following:

a. A monthly summary of the scrubber parameters listed in Specific Condition **B.14**.
   i. Total pressure drop
   ii. Water pressure at spray nozzles
   iii. Quantity water circulating thru scrubber
   iv. pH of scrubber water.
b. Amount of oil burned
c. Sulfur content of residual oil purchased for the season.

[Permit No. PSD-FL-134/AC50-144971/ AC50-144972]

B.30. SSM Reporting. All startups, shutdowns, and malfunctions shall be recorded on the operating log for this boiler. [Permit No. PSD-FL-134/AC50-144971/AC50-144972, as amended 7/22/91]

Other Requirements

B.31. Federal Rule Requirements. In addition to the specific conditions listed above, these emissions units are also subject to the requirements contained in 40 CFR 63, Subpart A – General Provisions and 40 CFR 63 Subpart DDDDD – National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters, and subsequent final revisions of these subparts. [Rule 62-213.440, F.A.C.]

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Subsection C. Lime Storage Silo

Subsection C. This section addresses the following emissions unit.

EU No.	Brief Description
007	Lime Storage Silo This is a lime storage silo used to store and handle lime for use in the sugar manufacturing process. The maximum process rate is 25 TPH. Particulate matter emissions associated with the pneumatic loading of the silo are controlled by a fabric filter baghouse (Walton/Stout, Model 21 BV8). The baghouse exhausts through a single 50' stack with a typical actual volumetric flow rate of 450 acfm at ambient temperature.

{Permitting note(s): The silo is classified as a new minor emissions unit under the PSD Program. The unit is classified as a "Regulated Emissions Unit" because it is subject to a unit-specific federally enforceable visible emission limitation (5 %).}

Essential Potential to Emit (PTE) Parameters

C.1. Hours of Operation: The permittee is authorized to operate the unit continuously. [Permit No. 0990019-001-AC]

Emission Limitations and Standards

Unless otherwise specified, the averaging times for Specific Condition **C.2.** are based on the specified averaging time of the applicable test method.

C.2. Visible Emissions: The permittee shall not allow visible emissions that exceed 5 % opacity (6-minute average). [Permit No. 0990019-001-AC]

C.3. Common Testing Requirements. Unless otherwise specified, tests shall be conducted in accordance with the requirements and procedures specified in Appendix TR, Facility-Wide Testing Requirements, of this permit. [Rule 62-297.310, F.A.C.]

Test Methods and Procedures

C.4. Test Methods. Required tests shall be performed in accordance with the following reference methods:

Method	Description of Method and Comments
9	Visual Determination of the Opacity of Emissions from Stationary Sources

C.5. Annual Compliance Tests Required. During each federal fiscal year (October 1st to September 30th), EU007 shall be tested to demonstrate compliance with the emissions standards for **VE**. [Permit No. 0990019-001-AC , Rule 62-297.310(7), F.A.C.]

C.6. Compliance Tests Prior To Renewal. Compliance tests shall be performed for **VE** once every 5 years. The tests shall occur prior to obtaining a renewed operating permit to demonstrate compliance with the emission limits in Specific Condition **C.2.** [Rules 62-210.300(2)(a) and 62-297.310(7)(a), F.A.C.]

C.7. Visible Emissions: The test method for visible emissions shall be EPA Reference Method 9, Rule 62-297.401(9), F.A.C. [Permit No. 0990019-001-AC]

C.8. Operating Test during VE tests. Osceola Farms shall conduct visible emission tests required for the lime silo while operating within 90-100% of the maximum silo loading rate. Testing may be conducted while operating at less than 90% of the maximum silo loading rate; however, if so, subsequent operation is limited up to 110% of the maximum silo loading rate during the test. Operation at higher loading rates is allowed for no more than 15 consecutive days for the purpose of conducting additional compliance tests to regain the higher maximum silo loading rate. [Permit No. 0990019-001-AC, amended 1/28/1998]

Subsection D. Bagasse Handling System

The specific conditions in this section apply to the following emissions unit:

EU No.	Brief Description
009	Bagasse Handling System (Sugarcane Processing Facility) The bagasse handling system includes the storage piles, transfer operations, and conveyors for bagasse and wood.

Essential Potential to Emit (PTE) Parameters

D.1. Hours of Operation. This emissions unit may operate continuously (8,760 hours/year). [Rule 62-210.200(PTE), F.A.C.]

D.2. Emissions Unit Operating Rate Limitation After Testing. See the related testing provisions in Appendix TR, Facility-wide Testing Requirements. [Rule 62-297.310(2), F.A.C.]

Emission Limitations and Standards

Unless otherwise specified, the averaging time for Specific Condition **D.3.** is based on the specified averaging time of the applicable test method.

D.3. Visible Emissions. Visible emissions shall not exceed 10 % opacity over any 6-minute period. The visible emissions limit shall not apply during periods of high winds (wind speeds of 18 miles per hour or greater) if the reasonable precautions in condition **D.4.** of this permit have been taken. [Permit No. AC50-112851]

D.4. Unconfined Particulate Matter. The owner or operator shall take the following reasonable precautions to prevent emissions of unconfined particulate matter at this emissions unit
a. Covered conveyors,
b. Windbreaks, and
c. Minimize the height of the drop points.
[Permit No. AC50-112851]

Test Methods and Procedures

D.5. Test Methods. Required tests shall be performed in accordance with the following reference methods:

Method	Description of Method and Comments
9	Visual Determination of the Opacity of Emissions from Stationary Sources

The above methods are described in 40 CFR 60, Appendix A, and adopted by reference in Rule 62-204.800, F.A.C. No other methods may be used unless prior written approval is received from the Department. [62-297.401, F.A.C., AC50-112851]

D.6. Common Testing Requirements. Unless otherwise specified, tests shall be conducted in accordance with the requirements and procedures specified in Appendix TR, Facility-Wide Testing Requirements, of this permit. [Rule 62-297.310, F.A.C.]

D.7. Annual Compliance Tests Required. During each federal fiscal year (October 1st to September 30th), EU009 shall be tested to demonstrate compliance with the emissions standards for **VE**. [Rule 62-297.310(7), F.A.C.]

D.8. Compliance Tests Prior To Renewal. Compliance tests shall be performed for **VE** once every 5 years. The tests shall occur prior to obtaining a renewed operating permit to demonstrate compliance with the emission limits in Specific Conditions **D.3.** [Rules 62-210.300(2)(a) and 62-297.310(7)(a), F.A.C.]

Subsection E. Emissions Unit 009

The specific conditions in this section apply to the following emissions units:

E.U. ID No.	Brief Description
010	Emergency RICE – Fire Pump AG Shop This is an emergency fire pump located at the AG shop. The reciprocating internal combustion engine (RICE) is a 115 bhp compression ignition engine manufactured by Detroit (Model # PTA ISD273) before 2005.
011	Emergency RICE – Sugar Mill Generator Emissions unit 011 is an emergency generator located at the sugar mill. The reciprocating internal combustion engine (RICE) is a 300 bhp compression ignition engine manufactured by Detroit before 2005.

The following table provides important details for these emissions units:

E.U. ID No.	Engine Brake HP	Date of Construction	Model Year	Primary Fuel	Type of Engine	Displacement liters/cylinder (loc)	Serial #	Date of last mod. or reconst.
010	115	Pre-2005	Pre-2005	Diesel	Emergency	------	4A021 8116	N/A
011	300	Pre-2005	Pre-2005	Diesel	Emergency	-------	12VA0 64705/ 71237 305	N/A

{Permitting Note: These emissions units, compression ignition (CI) engines, are regulated under 40 CFR 63, Subpart ZZZZ, NESHAP for Stationary RICE adopted in Rule 62.204.800(11)(b), F.A.C. This permit section addresses "existing" stationary CI RICE less than or equal to 500 HP that are located at a major source of HAP and that have not been modified or reconstructed after 6/12/2006. Unless the RICE is modified or reconstructed after 7/11/2005, NSPS 40 CFR 60, Subpart IIII, will not apply.}

Essential Potential to Emit (PTE) Parameters

E.1. Compliance Date. The owner or operator must be in compliance with the emission limits, operating limits and requirements in this subsection and in Subpart ZZZZ not later than May 3, 2013. [40 CFR 63.6595(a)(1)]

E.2. Method of Operation. The owner or operator must operate the emergency stationary RICEs according to the requirements in **a.** through **d**. In order to be considered emergency stationary RICEs under Subpart ZZZZ, any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year is prohibited. If the engine is not operated according to the requirements in (a) through (d), the engines will not be considered an emergency engine and must meet all the requirements for non-emergency engines under Subpart ZZZZ.

a. *Emergency Situations*. There is no time limit on the use of emergency stationary RICE in emergency situations. [40 CFR 63.6640(f)(1)]

b. The owner or operator may operate the emergency stationary RICE for any combination of purposes specified in i. through iii for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by c. and d. counts as part of the 100 hours per calendar year allowed by Specific Condition **E.2.b**.

i. *Maintenance and Testing*. Each RICE is authorized to operate for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and

transmission operator or the insurance company associated with the engine. The owner or operator may petition the permitting authority for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state or local standards require maintenance and testing of emergency RICE beyond 100 hours per calendar year. [40 CFR 63.6640(f)(2)(i)]

ii. *Emergency Demand Response*. The emissions units may be operated for emergency demand response for periods in which the Reliability Coordinator under the North American Electric Reliability Corporation (NERC) Reliability Standard EOP-002-3, Capacity and Energy Emergencies (incorporated by reference, see 63.14), or other authorized entity as determined by the Reliability Coordinator, has declared an Energy Emergency Alert Level 2 as defined in the NERC Reliability Standard EOP-002-3. [40 CFR 63.6640(f)(2)(ii)]

iii. The emissions units may be operated for periods where there is a deviation of voltage or frequency of 5 percent or greater below standard voltage or frequency. [40 CFR 63.6640(f)(2)(iii)]

c. *Non-emergency Situations*. Each RICE is authorized to operate up to 50 hours per calendar year in non-emergency situations, but those 50 hours are counted towards the 100 hours per year provided for maintenance and testing and emergency demand response. The 50 hours per year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity. [40 CFR 63.6640(f)(3)]

d. *Engine Startup*. During periods of startup the owner or operator must minimize the engine's time spent at idle and minimize the engine's startup time at startup to a period needed for the appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the emission standards applicable to all times other than startup apply. [40 CFR 63.6625(h), Table 2c]

<u>Emission Limitations and Operating Requirements</u>

E.3. <u>Work or Management Practice Standards</u>

a. *Oil and Filter*. Change oil and filter every 500 hours of operation or annually, whichever comes first. [40 CFR 63.6602 and 40 CFR 63 Table 2c(1)(a)]

b. *Air Cleaner*. Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first and replace as necessary. [40 CFR 63.6602 and 40 CFR 63 Table 2c(1)(b)]

c. *Hoses and Belts*. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary. [40 CFR 63.6602 and 40 CFR 63 Table 2c(1)(c)]

d. *Operation and Maintenance*. Operate and maintain the stationary RICE and after treatment control device, if any, according to the manufacturer's emission-related written instructions or develop your own maintenance plan which must provide, to the extent practicable, for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. [40 CFR 63.6625(e)]

e. *Oil Analysis*. The owner or operator has the option of using an oil analysis program to extend the oil change requirement in Specific Condition **E.3.a**. The oil analysis must be performed at the same frequency specified for changing the oil in **E.3.a**. The analysis program must at a minimum analyze the following three parameters: Total Base Number, viscosity, and percent of water content. The condemning limits for these parameters are as follows: Total Base Number is less than 30 percent of the Total Base Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent of water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the engine owner or operator is not required to change the oil. If any of the limits are exceeded, the engine owner or operator must change the oil within 2 business days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the engine owner or operator must change the oil within 2 business days or before commencing operation, whichever is later. The owner or operator must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine. [40 CFR 63.6625(i)]

Monitoring of Operations

E.4. Hour Meter. The owner or operator must install a non-resettable hour meter if one is not already installed. [40 CFR 63.6625(f)]

Compliance

E.5. Continuous Compliance. Each unit must be in compliance with the emission limitations, operating limitations and other requirements in this subsection and Subpart ZZZZ that applies at all times. [40 CFR 63.6605(a) and 63.6640(a)]

E.6. Operation and Maintenance of Equipment. At all times the owner or operator must operate and maintain, any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the compliance authority which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. [40 CFR 63.6605(b)]

Recordkeeping Requirements

E.7. Notification, Performance and Compliance Records.

a. A copy of each notification and report that the owner or operator submitted to comply with this section, including all documentation supporting any Initial Notification or Notification of Compliance Status that the owner or operator submitted. [40 CFR 63.6655(a)(1)]
b. The owner or operator must keep the records required in Specific Condition **E.3.(d)** of this section to show continuous compliance with each emission limitation or operating requirement. [40 CFR 63.6655(d)]
c. The owner or operator must keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The owner or operator must document how many hours are spent for emergency operation including what classified the operation as emergency and how many hours are spent for non-emergency operation. If the engines are used for the purposes specified in E2.b.ii or iii, the owner or operator must keep records of the notification of the emergency situation, and the date, start time, and end time of the engine operation for these purposes. [40 CFR 63.6655(f)]

E.8. Malfunction Records.

a. The owner or operator must keep records of the occurrence and duration of each malfunction of operation (i.e. process equipment) or the air pollution control and monitoring equipment. [40 CFR 63.6655(a)(2)]
b. The owner or operator must keep records of actions taken during periods of malfunction to minimize emissions in accordance with specific condition **E.6.** of this section including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation. [40 CFR 63.6655(a)(5) and 63.6605(b)]

E.9. Maintenance Records.

a. The owner or operator must keep records of all required maintenance performed on the air pollution control and monitoring equipment. [40 CFR 63.6655(a)(4)]
b. The owner or operator must keep records of the maintenance conducted on the stationary RICE in order to demonstrate that the stationary RICE and after-treatment control device (if any) are operated and maintained according to the owner or operators own maintenance plan. [40 CFR 63.6655(e)]

E.10. Record Retention.

a. The owner or operator must keep records in a suitable and readily available form for expeditious reviews. [40 CFR 63.6660(a)]
b. The owner or operator must keep each record readily accessible in hard copy or electronic form for at least 5 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record.[40 CFR 63.10(b)(1) and 63.6660(b) and (c)]

Reporting Requirements

E.11. Emergency Situation. If an emergency engine is operating during an emergency and it is not possible to shut down the engine in order to perform the work practice requirements on the schedule required in specific condition **E.3.** of this section, or if performing the work practice on the required schedule would otherwise pose an unacceptable risk under federal, state, or local law, the work practice can be delayed until the emergency is over or the unacceptable risk under federal, state, or local law has abated. The work practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under federal, state, or local law has abated. Sources must report any failure to perform the work practice on the schedule required and the federal, state or local law under which the risk was deemed unacceptable. [40 CFR 63 Table 2c, footnote 1]

E.12. Reporting Requirements. The owner or operator must report all deviations as defined in Subpart ZZZZ in the semiannual monitoring report required by this Title V operating permit. [40 CFR 63.6655(f)]

General Provisions

E.13. 40 CFR 63 Subpart A, General Provisions. This engine shall comply with all applicable requirements of 40 CFR 63 Subpart A, General Provisions, which have been adopted by reference in Rule 62-204.800(11)(d)1., F.A.C., except that the Secretary is not the Administrator for purposes of 40 CFR 63.5(e), 40 CFR 63.5(f), 40 CFR 63.6(g), 40 CFR 63.6(h)(9), 40 CFR 63.6(j), 40 CFR 63.13, and 40 CFR 63.14. This engine shall comply with the applicable portions of Appendix 40 NESHAP Subpart A included with this permit, as specified below.

General Provisions Citation	Subject of Citation
§63.1	General applicability of the General Provisions
§63.2	Definitions
§63.3	Units and abbreviations
§63.4	Prohibited activities and circumvention
§63.5	Construction and reconstruction
§63.6(a)	Applicability
§63.9(i)	Adjustment of submittal deadlines
§63.9(j)	Change in previous information
§63.10(a)	Administrative provisions for recordkeeping/reporting
§63.10(b)(1)	Record retention
§63.10(b)(2)(vi)–(xi)	Records
§63.10(b)(2)(xii)	Record when under waiver
§63.10(b)(2)(xiv)	Records of supporting documentation
§63.10(b)(3)	Records of applicability determination
§63.10(d)(1)	General reporting requirements
§63.10(d)(4)	Progress Reports
§63.10(f)	Waiver for recordkeeping/reporting
§63.12	State authority and delegations
§63.13	Addresses

SECTION IV. APPENDICES.

The Following Appendices Are Enforceable Parts of This Permit:

Appendix A, Glossary.
Appendix CAM, Compliance Assurance Monitoring Plan.
Appendix I, List of Insignificant Emissions Units and/or Activities.
Appendix NESHAP, Subpart A – General Provisions.
Appendix NESHAP, DDDDD - National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters.
Appendix NESHAP, ZZZZ – National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.
Appendix OMP-003, Operation and Maintenance Plan, Mill Boiler No. 3.
Appendix OMP-006, Operation and Maintenance Plan, Mill Boiler No. 6.
Appendix RBL, RACT, BACT and LAER Determinations.
Appendix RR, Facility-wide Reporting Requirements.
Appendix SSP, Startup/Shutdown Procedures for Boilers 2, 3, 4, 5, 6.
Appendix TR, Facility-wide Testing Requirements.
Appendix TV, Title V General Conditions.
Appendix U, List of Unregulated Emissions Units and/or Activities.
Appendix Wood, Authority to Burn Wood Chip Fuel.