FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

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

RICK SCOTT
GOVERNOR

HERSCHEL T. VINYARD JR.
SECRETARY

Electronic Mail
Received Receipt Requested

Mr. Jose Gonzalez, Vice President of Industrial Operations
Osceola Farms Company
32298 State Road 700
Pahokee, Florida 33476

Re: Title V Air Operation Permit Renewal
PROPOSED Permit Project No.: 0990019-012-AV
Osceola Farms

Dear Mr. Gonzalez:

One copy of the "PROPOSED Determination" for the renewal of a Title V Air Operation Permit for the Osceola Farms located in Palm Beach County at U.S. 98 and Hatton Highway, Pahokee, Florida is enclosed. This letter is only a courtesy to inform you that the DRAFT Permit has become a PROPOSED Permit.

An electronic version of this determination has been posted on the Division of Air Resources Management's World Wide Web site for the United States Environmental Protection Agency (USEPA) Region 4 office's review. The web site address is "http://www.dep.state.fl.us/air/eproducts/ards/default.asp"

Pursuant to Section 403.0872(6), Florida Statutes, if no objection to the PROPOSED Permit is made by the USEPA within 45 days, the PROPOSED Permit will become a FINAL Permit no later than 55 days after the date on which the PROPOSED Permit was mailed (posted) to USEPA. If USEPA has an objection to the PROPOSED Permit, the FINAL Permit will not be issued until the permitting authority receives written notice that the objection is resolved or withdrawn.

If you should have any questions, please contact Project Engineer, Susan Machinski, by telephone at (239) 344-5663 or by email at susan.machinski@dep.state.fl.us.

Sincerely,

_____ May 15, 2013

Jon M. Iglehart
Director of District Management

Date

JMI/SRM/mf

Enclosures
Cc: Mr. Jose Gonzalez, Osceola Farms: jose_gonzalez@floridacrystals.com
Mr. Matthew Capone, Osceola Farms: matthew_capone@floridacrystals.com
Mr. David A. Buff, P.E., Golder Associates: dbuff@golder.com
Mr. James Stormer, PBCHD: james_stormer@doh.state.fl.us
Ms. Natasha Hazziez: Hazziez.natasha@epamail.gov
Ms. Ana Oquendo, EPA Region 4: oquendo.ana@epamail.epa.gov
Ms. Barbara Friday, DEP BAR: barbara.friday@dep.state.fl.us (for posting with U.S. EPA, Region 4)

PROPOSED Determination

I. Public Notice.

An "INTENT TO ISSUE TITLE V AIR OPERATION PERMIT RENEWAL" to Osceola Farms Company for the Osceola Farms located in Palm Beach County at U.S. 98 and Hatton Highway, Pahokee, Florida was clerked on March 15, 2013. The "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT RENEWAL" was published in the Palm Beach Daily News on April 12, 2013. The DRAFT Permit was available for public inspection at the Florida Department of Environmental Protection South District Office in Fort Myers, Florida. Proof of publication of the "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT RENEWAL" was received on April 19, 2013.

II. Public Comment(s).

Comments were received and the DRAFT Permit was changed. The comments were not considered significant enough to reissue the DRAFT Permit and require another Public Notice. Comments were received from the applicant during the 30 (thirty) day public comment period. The following summarizes the comments and the Department's response.

1. ***Comments***: Several changes were requested to correct typographical items.

***Response*:** As a result of these comments, the typographical errors have been corrected in Specific Conditions No. **FW11.a**., **B.28.c**. and **E.3.e.**

2. ***Comment***: Condition **FW13.b**. should be clarified to indicate that reporting pertains to total steam production.

***Response*:** As a result of this comment, Specific Condition No**. FW.13.b.** is hereby changed as follows:

> *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]

3. ***Comment***: Reword Specific Condition **A.17.** to be consistent with Specific Condition **A.16.**

***Response*: Agreed.** As a result of this comment, **Specific Condition No. A.17.** is hereby changed as follows:

> 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.]

4. ***Comment***: The language in Specific Condition **A.23.** should be consistent with air construction Permit No. 0990019-013-AC.

***Response*:** As a result of this comment and to be consistent with the air construction permit, Specific Condition No**. A.23.** is hereby changed as indicated below. Additionally, the Department added two sentences at the end of Specific Condition **A.23.d.i., A.23.1.d.ii. A.23.1.e.i**. and **A.23.1e.ii**. to clarify ambiguity relating to operating rate during testing and operating rate after testing.

a. 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 ~~of~~ 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.

b. Each exhaust stack shall be tested for PM, VOC and NO_X emissions.

c. The pollutant emissions results (average of three test runs) from each exhaust stack's test shall be added together for compliance demonstration reporting.

d. 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 test run on 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 ~~first~~ test runs on the first day of testing, regardless of which scrubber stack is being tested.

e. 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 test run on 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 ~~first~~ 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.}*

5. ***Comment***: The footnotes regarding boiler efficiency should apply to both Boiler No. 3 and Boiler No. 6.

***Response*:** The footnotes were from each of this boiler's air construction permits. These permits did not indentify that they were applicable to both boilers. As such, the footnotes will remain as they were identified in each boiler's air construction permit.

6. ***Comment***: A request was made to correct Specific Condition No**. C.8.** to reflect the amended air construction permit

***Response*:** As a result of this comment, Specific Condition No. **C.8** is hereby changed:

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 ~~100~~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]

6. ***Comment***: A request was made to correct correct several typographical errors in Appendix I as well as to add activities/emissions units to Appendix I.

Response**:** As a result of this comment, **typographical errors have been corrected in** Appendix I. Requested activities have bee added to Appendix I with the exception of "Painting of harvesting equipment and trailer in open areas. This activity is identified in Appendix U, EU025, Surface Coating Operations.

III. Conclusion.

The permitting authority hereby issues the PROPOSED Permit, with any changes noted above.