Title V Air Operation Permit Revision
Permit No. 0990019-016-AV

APPLICANT

The applicant for this project is Osceola Farms Company. The applicant's responsible official and mailing address are Mr. Jose Gonzalez, Vice President of Industrial Operations, Osceola Farms Company, Osceola Farms, 32298 State Road 700 Pahokee, Florida 33476.

FACILITY DESCRIPTION

The facility is a sugar mill and boiling house. The facility processes sugarcane. The existing facility consists of the following emissions units: five boilers (Nos. 2, 3, 4, 5 and 6), a lime silo, bagasse handling and storage, and two emergency reciprocating internal combustion engines. The facility is a major source for prevention significant deterioration (PSD).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.

A list of the emission units (EU) at the facility is given below.

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 System (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

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 62-210.200(194), F.A.C.

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

PROJECT DESCRIPTION

The purpose of this permitting project is to revise the existing Title V permit (Permit No. 0990019-012-AV) for the above referenced facility to incorporate a 1 year compliance extension for Boiler Nos. 2 and 5 to meet the requirements of 40 Code of Federal Regulations (CFR) Part 63, subpart DDDDD - National Emission Standards for

Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters (Boiler MACT Rule). The extension establishes a compliance date of January 31, 2017 for Boiler Nos. 2 and 5 to meet the requirements of the Boiler MACT Rule.

PROCESSING SCHEDULE AND RELATED DOCUMENTS

Revision request received December 3, 2014.

Draft/Proposed Title V Permit revision issued on January xx, 2015.

PRIMARY REGULATORY REQUIREMENTS

Title III: The facility is identified as a major source of hazardous air pollutants (HAP).

Title V: The facility is a Title V major source of air pollution in accordance with Chapter 62-213, Florida Administrative Code (F.A.C.).

PSD: The facility is a Prevention of Significant Deterioration (PSD)-major source of air pollution in accordance with Rule 62-212.400, F.A.C.

NSPS: The facility does not operate units subject to the New Source Performance Standards (NSPS) of 40 Code of Federal Regulations (CFR) 60.

NESHAP: The facility does operate units subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) of 40 CFR 63. The emission units subject NESHAP requirements are given below.

Regulation	**EU No(s).**
40 CFR 63, Subpart A – General Provisions	002, 003, 004, 005, 006, 010, 011
40 CFR 63, Subpart DDDDD – National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters	002, 003, 004, 005, 006
40 CFR 63, Subpart ZZZZ – National Emission Standard for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines	010, 011

CAIR: The facility is not subject to the Clean Air Interstate Rule (CAIR) set forth in Rule 62-296.470, F.A.C.

CAM: Compliance Assurance Monitoring (CAM) applies to EUs 002, 003, 004, 005 and 006 for emissions of PM. PM emissions are being controlled by wet scrubbers.

PROJECT REVIEW

The following changes were made to the revised Title V air operation permit.

1. In **Subsection III-A** of the Title V revision the following conditions were added that are related to the Boiler MACT Rule extension for Boiler Nos. 2 and 5 (EU 002 and 005):

   40 CFR 63, Subpart DDDDD (Boiler MACT Rule)

   A.28. Boiler MACT Rule Requirements. Boiler Nos. 2, 4 and 5 are subject to the requirements of 40 CFR 63, subpart DDDDD - National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters (Boiler MACT Rule) which are contained in Appendix NESHAP, DDDDD of the permit. [40 CFR 63, subpart DDDDD]

   A.29. Compliance Date Extension: For Boiler Nos. 2 and 5, the Boiler MACT compliance date is extended from January 31, 2016 to January 31, 2017. For Boiler Nos. 3, 4 and 6, the Boiler MACT compliance date remains January 31, 2016. [40 CFR 63.6(i); and Rule 62-204.800(11)(d)1., F.A.C.]

A.30. Key Milestones: Unless the permittee notifies the Department in advance, the permittee shall meet the following schedule for completing the installation of the control equipment and demonstrating compliance with the Boiler MACT requirements for Boiler Nos. 2 and 5.

Key Milestones	Target Completion Date
Complete Engineering Design of Pollution Control Equipment Boiler No. 2 • Improved Over-fire Air System • New Bagasse Feeder System • New Ash Removal System Boiler No. 5 • Convert to Inclined, Water-Cooled Pinhole Grate • Improved Over-fire Air System • New Bagasse Feeder System • New Ash Removal System	01/31/2016
Complete Procurement of Control Equipment	04/01/2016
Complete Installation of Control Equipment	09/30/2016
Complete Acceptance, and Operational Testing of Control	04/03/2017
Complete Boiler MACT Performance Testing	04/03/2017
Progress Reports	Quarterly

The permittee shall provide advance notice to the Division and Compliance Authority if it is unable to meet a target in the above schedule and shall identify a new completion date. [40 CFR 63.6(i)(10) and (11), Rule 62-204.800(11)(d)1., F.A.C., and Rule 62-4.070, F.A.C.]

A.31. Progress Reports: By January 31, 2016, the permittee shall provide a written report to the Division and the Compliance Authority that summarizes the work completed to date and the work remaining on Boiler Nos. 2 and 5. Thereafter, the permittee shall provide quarterly written progress report within 30 days following each calendar quarter and an updated schedule if necessary to the Division and Compliance Authority. [40 CFR 63.6(i)(10) and (11), Rule 62-204.800(11)(d)1., F.A.C., and Rule 62-4.070, F.A.C.]

A.32. Full Boiler MACT Compliance: In accordance with 40 CFR §63.7510, the permittee shall demonstrate initial compliance for Boiler Nos. 2 and 5 with a compliance date of January 31, 2017. [40 CFR 63.7510]

2. The following condition related to the Boiler MACT Rule was added to **Subsection III-B** of the permit:

40 CFR 63, Subpart DDDDD (Boiler MACT Rule)

B.32. Boiler MACT Rule Requirements. Boiler Nos. 3 and 6 are subject to the requirements of 40 CFR 63, subpart DDDDD - National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters (Boiler MACT Rule) which are contained in Appendix NESHAP, DDDDD of the permit. The compliance date for these boilers is January 31, 2016. [40 CFR 63, subpart DDDDD]

3. The following appendices were updated with the latest versions:

   a. Appendix NESHAP, Subpart A – General Provisions;

   b. Appendix NESHAP, DDDDD - National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters; and

   c. Appendix RR, Facility-Wide Reporting Requirements.

4. The appendix containing the startup and shutdown procedures for Boiler Nos. 2, 3, 4, 5, and 6 was broken into individual appendices.

CONCLUSION

This project revises Title V air operation permit No. 0990019-012-AV, which was issued on June 28, 2013. This revision is issued under the provisions of Chapter 403, Florida Statues (F.S.), and Chapters 62-4, 62-210 and 62-213, F.A.C.