Title V Air Operation Permit Revision
Permit No. 0990026-022-AV

APPLICANT

The applicant for this project is Sugar Cane Growers Cooperative of Florida. The applicant's responsible official and mailing address are: Mr. Jose F. Alvarez, Executive VP Operations & General Manager, Sugar Cane Growers Cooperative of Florida, Glades Sugar House, 1500 West Sugar House Road, Belle Glade, Florida 33430.

FACILITY DESCRIPTION

The applicant operates the Glades Sugar House, which is located located in Palm Beach County at 1500 West Sugar House Road, Belle Glade, Florida 33430.

The facility operates on steam produced from six boilers. The total steam generating capacity of the boilers is 1,181,854 lb/hr when the six boilers operate at rated capacity. The boilers are capable of burning carbonaceous fuel (bagasse and residue), fuel oil, small quantities of on-spec used oil, natural gas. The boilers are equipped with dust collectors and wet scrubbers to control particulate matter (PM) emissions. During the off-season, operation of the boilers is restricted and limited to only Boilers 1, 2, 4, 5, and 8. There is a painting facility at the site. The facility has miscellaneous /insignificant emissions units and/or activities. The facility emission units are also subject to Rule 62-296.570, F.A.C. (Reasonably Available Control Technology for NO_x and VOC); and Rule 62-296.410, F.A.C. (Carbonaceous Fuel Burning Equipment.) and Rule 62-212.400, F.A.C., [Prevention of Significant Deterioration (PSD) and Best Achievable Control Technology (BACT)], 40 CFR 64 (Compliance Assurance Monitoring), 40 CFR 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).

PROJECT DESCRIPTION

The purpose of this permitting project is to revise the existing Title V permit for the above referenced facility. The two permit revision projects (Nos. 0990026-021-AV and 0990026-022-AV) are being addressed in a single permit revision, Permit No. 0990026-022-AV. This Title V revision permit incorporates part of air construction permit No. 0990026-019-AC and incorporates air construction permit No. 0990026-017-AC/PSD-FL-077B/PSD-FL-213A, revises the facility's Compliance Assurance Monitoring (CAM) Plan to include a Quality Improvement Plan and incorporates Title 40 Code of Federal Regulations (CFR) Part 63 Subparts A and DDDDD (General Provisions and National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters, respectively).

PROCESSING SCHEDULE AND RELATED DOCUMENTS

Renewed Title V Air Operation Permit issued **November 28, 2011**
Applications for a Title V Air Operation Permit Revision received **April 19, 2013**

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 operates units subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) of 40 CFR 63.

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 Units 001, 002, 003, 004, 005 and 008.

PROJECT REVIEW

This project incorporates two Title V revision applications (projects Nos. 0990026-021-AV and 0990026-022-AV) in a single permit project (No. 0990026-022-AV). Project No. 0990026-022-AV incorporates part of air construction permit Nos. 0990026-019-AC and incorporates 0990026-017-AC/PSD-FL-077B/PSD-FL-213A. Project No. 0990026-022-AV also revises the facility's Compliance Assurance Monitoring (CAM) Plan as the result of compliance assistance request for a QIP due to excessive excursions. This project is also incorporating Title 40 Code of Federal Regulations (CFR) Part 63 Subparts A and DDDDD (General Provisions and National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters, respectively).

Project 0990026-021-AV requested that each boilers' scrubber CAM indicators for pressure drop not be considered applicable when the boiler steam rate dropped below specified production rates. The applicant submitted the following reasons for low steam production and associated low pressure drop: mill start up, mill slow down due to arc fault, mill slow down due to total electrical blackout, rain event, Christmas slow down, repair to boiler. Appendix CAM Condition 7 states:

7. Continued Operation. Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the owner or operator shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. **Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part**, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. **A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data**. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions. [40 CFR 64.7(c)]

The Department believes that several of the application reasons for low steam production and low pressure drop may be addressed by the above Appendix CAM condition. Start up and shutdown periods might be considered under excess emission rules in 62-210.700, FAC. The general criteria in 40 CFR 64 states that reasonable assurance of ongoing compliance with emission limitations or standards for the anticipated range of operations shall be meet. The application did not provide reasonable assurance that compliance with emission limits would be meet at the lower steam production rates or the lower pressure drops. The application did not provide justification that meets the requirements of 40 CFR 64. Therefore, the Department did not approve this request. The Department is willing to review this matter in a future request for revision to the CAM plan and CAM indicators if the applicant submits justification that meets the requirements of 40 CFR 64, including reasonable assurance of compliance with emission limits.

Project 0990026-021-AV also requested that Boiler No. 4's north and south CAM Plan indicator parameters for water flow be based on 80% of the minimum parameter value from test runs and 120% of the maximum parameter value from test runs. The justification for this was limited water flow data during compliance test. The application did not provide reasonable assurance that compliance with emission limits would be meet at requested higher and lower water flow rates. The application did not provide justification that meets the requirements of 40 CFR 64. Therefore, the Department did not approve this request. The Department has approved water flow indicator parameters that are based on 90% of the minimum parameter value from test runs and 110% of the maximum parameter value from test runs. The applicant may submit in the future a request, along with test data demonstrating compliance with emission limits, to revise the CAM plan to widen the water flow indicator range.

The applicant has stated that there are no reciprocating internal combustion engines, generators or emergency generator on the facility site.

CONCLUSION

This project revises Title V air operation permit No. 0990026-016-AV, which was issued on November 28, 2011. This Title V air operation permit 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.