PERMITTEE

Senior Vice President and General Manager, Sugar Refining
United States Sugar Corporation
111 Ponce De Leon Ave.
Clewiston, Florida 33440

PERMITTING AUTHORITY

Florida Department of Environmental Protection
Engineering and Permitting Section
South District Office
2295 Victoria Avenue, Suite 364
Fort Myers, Florida 33901-2549

PROJECT

Air Permit No. 0510003-055-AC
Air Construction Permit
U.S. Sugar Clewiston Facility

The project is to add one (1) new Baghouse to serve the Sugar Packaging Lines (S-4), and re-locating the existing Sugar Packaging Line Baghouse to serve the Bulk Loading Operation (S-17).

NOTICE AND PUBLICATION

The Department distributed a draft minor source air construction permit package on May 10, 2013. The applicant published the Public Notice in the Clewiston News Newspaper on May 23, 2013. The Department received the proof of publication on May 30, 2013. No requests for administrative hearings or requests for extensions of time to file a petition for administrative hearing were received.

COMMENTS

No comments on the Draft Permit were received from the public, the Department's South District Office.

Applicant

On May 14, 2013, the Department received comments from the applicant. The following summarizes the comments and the Department's response.

1. <u>Comment:</u>

   The new baghouse will be similar to the eleven other baghouses, including the existing baghouse (S-17) which will be serving only the bulk loadout operations. Specific Conditions G.4., G.5. and G.8. of the current Title V Permit (Permit No. 0510003-053-AV) state:

   G.4. Compliance with the above PM standards is assumed if compliance with the opacity standard is demonstrated. [Rules 62-210.200(PTE), F.A.C. and Permit No. PSD-FL-272B]

   G.5. Opacity Standard: As a surrogate for particulate matter, visible emissions shall not exceed 5% opacity from any of these emissions units or points. [Rule 62-212.400(PSD), F.A.C. and Permit No. PSD-FL-272B]

   G.8. During each federal fiscal year (October 1st to September 30th), the permittee shall conduct visible emissions tests on each baghouse exhaust. Compliance with the PM standards shall be assumed as long as the emission unit remains in compliance with the opacity standard. [Rule 62-297.310(7)(a)1, F.A.C. and Permit No. PSD-FL-272B]

Response:

The Specific Conditions for "Emission Standards" and "Test Requirements" are revised to incorporate Specific Conditions G.4., G.5. and G.8. of the current Title V Permit (Permit No. 0510003-053-AV).

2. Comment.

Specific conditions 5 through 9 of the draft construction permit should be revised to reflect the conditions from the Title V permit. The following language is suggested for the air construction permit:

a) EU-022 - PM Standard: As determined by EPA Method 5, PM emissions shall not exceed 0.38 pounds per hour from the baghouse.

b) EU-045 – PM Standard: As determined by EPA Method 5, PM emissions shall not exceed 0.21 pounds per hour from the baghouse.

c) Compliance with the above PM standards is assumed if compliance with the opacity standard is demonstrated.
[Rules 62-210.200(PTE), F.A.C. and Permit Nos. PSD-FL-272B and 0510003-055-AC]

d) Opacity Standard: As a surrogate for particulate matter, visible emissions shall not exceed 5% opacity from either of these emissions points.
[Rule 62-212.400(PSD), F.A.C. and Permit Nos. PSD-FL-272B and 0510003-055-AC]

f) Initial Compliance Tests: The emissions unit shall be tested to demonstrate initial compliance with the emissions standards for Visible Emissions (VE). The initial tests shall be conducted within 60 days after achieving permitted capacity, but not later than 180 days after initial operation of the unit.
[Rules 62-4.070(3) and 62-297.310(7)(a)1, F.A.C.]

g.) Annual Compliance Tests: During each federal fiscal year (October 1st to September 30th), the permittee shall conduct visible emissions tests on each baghouse exhaust. Compliance with the PM standards shall be assumed as long as the emission unit remains in compliance with the opacity standard.
[Rule 62-297.310(7)(a)1, F.A.C. and Permit Nos. PSD-FL-272B and 0510003-055-AC]

h. Item 5 [Remove completely… compliance shown with annual VE tests]

Response:

The above subjects are revised as requested.

CONCLUSION

The final action is to issue the permit with the minor changes, corrections and clarifications as described above.