FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
SOUTH DISTRICT
P.O. BOX 2549
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Electronic Mail
Received Receipt Requested

PERMITTEE

United States Sugar Corporation
111 Ponce De Leon Avenue
Clewiston, Florida 33440

Air Permit No. 0510003-058-AC
Permit Expires: January 30, 2016
U.S. Sugar Clewiston Facility
Upgrade OFA Systems for
Boiler Nos. 1 and 2

This is the final air construction permit, which authorizes the upgrade of the OFA (Overfire Air Systems) for Boiler Nos. 1 and 2 to meet MACT CO limits in emissions. (NESHAPS 40 CFR 63 Subpart DDDDD). The upgraded OFA (Overfire Air System) modifications will provide more uniform mixing of the fuel and air. The upgrades to the OFA systems are not projected to result in a significant increase in any PSD pollutant. The more complete mixing of combustion air and fuel should provide greater carbon burnout, thereby lowering CO emissions. The proposed work will be conducted at the U.S. Sugar Clewiston Facility, which is a Sugar Cane Mill and Refinery (Standard Industrial Classification Nos. 2061 and 2062). The facility is located in Hendry County at W.C. Owens Avenue and S.R. 832 in Clewiston, Florida. The UTM coordinates are Zone 17, 506.1 km East, and 2956.9 km North. As noted in the Final Determination provided with this final permit, only minor changes and clarifications were made to the draft permit, if any.

This final permit is organized by the following sections.

Section 1. General Information
Section 2. Administrative Requirements
Section 3. Emissions Unit Specific Conditions
Section 4. Appendices

Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 of this permit.

This air pollution construction permit is issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to conduct the proposed work in accordance with the conditions of this permit. This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Upon issuance of this final permit, any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel (Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000) and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within 30 days after this order is filed with the clerk of the Department.

Executed in Fort Myers, Florida

_____ July 8, 2014
Jon M. Iglehart Date
Director of District Management

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Determination and Final Permit) was sent by electronic mail (or a link to these documents made available electronically on a publicly accessible server) with received receipt requested before the close of business on July 8, 2014 to the persons listed below.

Mr. Neil Smith, (nsmith@ussugar.com)
Mr. Philip D. Cobb,P.E. (pcobb@golder.com)
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Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.

_____ July 8, 2014
(Clerk) (Date)

FACILITY AND PROJECT DESCRIPTION

EXISTING FACILITY

This facility is a sugar mill and refinery. Sugarcane is harvested in nearby cane fields and transported to the mill by train. In the mill, sugarcane is cut into small pieces and processed in a series of presses to squeeze juice from the cane. The juice undergoes clarification, separation, evaporation, and crystallization to produce raw, unrefined sugar. In the refinery, raw sugar is decolorized, concentrated, crystallized, dried, conditioned, screened, packaged, stored, and distributed as refined sugar. The fibrous byproduct remaining from the sugarcane is called bagasse and is burned as boiler fuel to provide steam and heating requirements for the mill and refinery. Molasses is also produced as a byproduct. Molasses is stored and processed into an animal feed product for sale.

The existing facility consists of the following emissions units.

Facility ID No. 0510003

ID No.	Emission Unit Description
Sugar Mill	
001	Boiler 1
002	Boiler 2
009	Boiler 4
014	Boiler 7
027	Biomass Handling and Storage
028	Boiler 8
031	Lime Storage and Truck/Rail Handling System
Sugar Refinery	
015	VHP Sugar Dryer
016	White Sugar Dryer No. 1
017	Granular Carbon Regeneration Furnace
018	Vacuum Pickup Systems
019	Conditioning Silos
020	Screening/Distribution and Sugar/Starch Bins
021	Alcohol Usage
022	Packaging Dust Collector
029	White Sugar Dryer No. 2
035	Rental Refinery Package Boiler
Facility	
010	Lime Silo with Baghouse at the Water Treatment Plant
030	Limestone Storage Silo with Baghouse at the Molasses Plant
033	Salt Silo with Baghouse at the Molasses Plant
036	Two Hydrogen Sulfide (H_2S) Degasification Systems
037	Emergency Reciprocating Internal Combustion Engine(RICE) (WWTP East Pump Station)
038	Emergency RICE (Fire Pump Building)
039	Emergency RICE (WWP 2nd Floor Pump Room)

040	Emergency RICE (WTP Portable Generator)
042	Emergency RICE (Computer/IT Backup)
041	Emergency RICE (WTP Plant Generator)

Proposed Project

This project will modify the following emissions units.

Facility ID No. 0510003	
ID No.	**Emission Unit Description**
001	Boiler No. 1
002	Boiler No. 2

The project is an upgrade of the OFA (Overfire Air Systems) for Boiler Nos. 1 and 2, to meet Boiler MACT CO limits in emissions. (NESHAPS Subpart DDDDD). The upgraded OFA (Overfire Air System) modifications will provide more uniform mixing of the fuel and air. The upgrades to the OFA systems are not projected to result in a significant increase in any PSD pollutant. The maximum steam rate of Boiler Nos. 1 and 2 will not change as a result of this project, nor will the fuel feed rates or maximum heat input rates change. The more complete mixing of combustion air and fuel will provide greater carbon burnout, thereby lowering CO emissions. Boilers 1 and 2 are classified as "Hybrid Suspension Grate" (HGS) boilers under 40 CFR 63.7575.

FACILITY REGULATORY CLASSIFICATION

- The facility is a major source of hazardous air pollutants (HAP).
- The facility has no units subject to the acid rain provisions of the Clean Air Act (CAA).
- The facility is a Title V major source of air pollution in accordance with Chapter 213, F.A.C.
- The facility is a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.
- The facility is subject to 40 CFR 63 Subpart ZZZZ.
- The boilers are subject to 40 CFR 63 Subpart DDDDD.
- NESHAP, 40 CFR 63 Subpart A – General Provisions.

SECTION 2. ADMINISTRATIVE REQUIREMENTS

1. Permitting Authority: The permitting authority for this project is the South District Engineering and Permitting Section, Florida Department of Environmental Protection (Department). The South District's mailing address is P.O. Box 2549, Fort Myers, Florida 33902-2549. All documents related to applications for permits to operate an emissions unit and all actual emissions reporting shall be submitted to the South District.

2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the South District Office. The mailing address and phone number of the South District Office is: P.O. Box 2549, Fort Myers, Florida 33902-2549 and (239) 344-5600.

3. Appendices: The following Appendices are attached as part of this permit:

   Appendix A. Citation Format and Glossary

   Appendix B. Identification of Primary State and Federal Regulations

   Appendix C. General Testing Requirements

   Appendix H. Compliance Assurance Monitoring Plan (CAM), General Provisions

   Appendix I. Fuel Monitoring

   Appendix J. Good Combustion Practices for All Boilers

   Appendix K. Startup, Shutdown and Malfunction Plans for Mill Boilers

   Appendix O. NESHAP 40 CFR 63 Subparts A and DDDDD

4. Applicable Regulations, Forms and Application Procedures: Unless otherwise specified in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.

5. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]

6. Modifications: The permittee shall notify the Compliance Authority upon commencement of construction. No new emissions unit shall be constructed and no existing emissions unit shall be modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]

7. Application for Title V Permit: This permit authorizes construction of the permitted emissions units and initial operation to determine compliance with Department rules. A Title V air operation permit is required for regular operation of the permitted emissions unit. The permittee shall apply for a Title V air operation permit at least 90 days prior to expiration of this permit, but no later than 180 days after commencing operation. To apply for a Title V operation permit, the applicant shall submit the appropriate application form, compliance test results, and such additional information as the Department may by law require. The application shall be submitted to the appropriate Permitting Authority with copies to the Compliance Authority. [Rules 62-4.030, 62-4.050, 62-4.220 and Chapter 62-213, F.A.C.]

A. Boiler Nos. 1 and 2

This section of the permit addresses the following emissions units.

Facility ID No. 0510003	
ID No.	**Emission Unit Description**
001	Boiler No. 1
002	Boiler No. 2

Boiler 1

Is a vibrating grate boiler with a maximum steam production rate of 185,000 lb/hour (24-hour average) at 750° F and 600 psig. Bagasse is the primary fuel and distillate oil is a startup and supplemental fuel. Particulate matter emissions are controlled by a Type D, Size 125, Joy Turbulaire wet impingement scrubber. Exhaust gases exit at 150° F with an approximate flow rate of 250,000 acfm from a stack that is 8 feet in diameter and 213 feet tall.

Boiler 2

Is a vibrating grate boiler with a maximum steam production rate of 185,000 lb/hour (24-hour average) at 750° F and 600 psig. Bagasse is the primary fuel and distillate oil is a startup and supplemental fuel. Particulate matter emissions are controlled by a Type D, Size 125, Joy Turbulaire wet impingement scrubber. Exhaust gases exit at 150° F with an approximate flow rate of 250,000 acfm from a stack that is 8 feet in diameter and 213 feet tall.

These Boilers will be modified to meet the "Boiler MACT" rule, which is codified in Title 40 of the Code of Federal Regulations, Part 63 (40 CFR 63), Subpart DDDDD.

PROJECT

1. The project is an upgrade of the OFA (Overfire Air Systems) for Boiler Nos. 1 and 2, to meet Boiler MACT CO limits in emissions. (NESHAPS 40 CFR 63 Subpart DDDDD). The upgraded OFA (Overfire Air System) modifications will provide more uniform mixing of fuel and air. The upgrades to the OFA systems are not projected to result in a significant increase in any PSD pollutant. The maximum steam rate of Boiler Nos. 1 and 2 will not change as a result of this project, nor will the fuel feed rates or maximum heat input rates change. The more complete mixing of combustion air and fuel will provide greater carbon burnout, thereby lowering CO emissions.

PERFORMANCE RESTRICTIONS

2. Permitted Capacity: [Rule 62-210.200(PTE), F.A.C.]

Parameter	Boiler 1	Boiler 2
Steam Production, lb/hour (24-hour average)	185,000	185,000
Total Heat Input Rate, MMBtu/hour (24-hour average)	397	397
Heat Input Rate from Oil, MMBtu/hour (1-hour average)	130	130
Oil Firing Rate (gallons per hour, maximum)	963	963

[Rules 62-4.070(3) and 62-213.440(4), F.A.C.; and Permit Nos. 0510003-039-AC and PSD-FL-272]

3. Authorized Fuel: Each boiler is authorized to fire the following fuels.

   a. *Bagasse*: The primary fuel is bagasse, which is the fibrous byproduct remaining from the sugarcane after milling.
   b. *Distillate Oil*: Any oil fired in these boilers shall be new No. 2 distillate oil (or a superior grade) containing no more than 0.05% sulfur by weight. The oil firing system for each boiler consists of the following general equipment: one multi-stage low-NO_X burner (0.17 lb/MMBtu) with a steam-atomized center-fired oil gun; a flame scanner; an igniter with flame proving rod, and an individual burner wind box with an electrically-operated modulating damper.
   c. *On-specification Used Oil*: Incidental amounts of on-specification used oil (≤0.05% sulfur by weight) generated on site may be co-fired.
   d. *Petroleum-contaminated Soils*: Small quantities of petroleum-contaminated soils not to exceed 500 cubic yards per boiler per season may be co-fired. Such soils shall contain only soil, "virgin" fuels and oils, and/or "on-specification" used oil. Petroleum-contaminated soils shall be fired at a rate of no more than 2% by weight of the bagasse feed rate to the boiler.

   [Rules 62-210.200(PTE), 62-212.400(12) and 62-213.410, F.A.C.; and Permit Nos. 0510003-039-AC and PSD-FL-272B]

4. Restricted Operation

   These units operate primarily during the sugarcane crop season (October through April) and the hours of operation are not limited; however, the following restrictions apply.

   a. *Off Season*: Boilers 7 and 8 shall operate as the primary units to support the sugar refinery during the off season (May through September). When Boilers 7 and 8 are down for maintenance, repair or during periods of unusually low steam demand, Boilers 1,2 and 4 may operate individually or simultaneously as backup units, but the combined total steam production shall not exceed 1,845,000 pounds of steam during any 3-hour period and 10,800,000 pounds of steam during any 24-hour period. An application to modify any of the above steam production limitations shall be accompanied by a revised air quality analysis that demonstrates compliance with the ambient air quality standards and PSD increments for the revised conditions. A request to modify these restrictions shall be accompanied by a new PSD Air Quality Analysis.
   b. *Oil Firing*: The combined oil firing from Boilers 1, 2 and 4 shall not exceed 6,000,000 gallons during any consecutive 12 months. [Rule 62-210.200(PTE); and Permit Nos. PSD-FL-272B and 0510003-039-AC]
   c. Prior to January 30, 2016, and annually thereafter, for each boiler, the permittee shall conduct a tune up of the boiler as specified in 40 CFR 63.7540 as a work practice for dioxins/furans. [Table 3 to Subpart DDDDD of 40 CFR 63].
   d. Prior to January 30, 2016, the permittee shall conduct a one-time energy assessment for the facility, performed by a qualified energy assessor, as specified in 40 CFR 63.7510(e). [Table 3 to Subpart DDDDD of 40 CFR 63].
   e. After January 30, 2016, for each boiler, the permittee shall comply with the monitoring, installation, operation, and maintenance requirements in 40 CFR 63.7525.

CONTROL EQUIPMENT AND TECHNIQUES

5. Wet Scrubbers:

   a. For each boiler, the permittee shall operate and maintain a Joy Turbulaire wet impingement scrubber (Type D, Size 125) to control particulate matter emissions and achieve the emissions standards specified

in this permit. In accordance with the manufacturer's recommendations, each wet scrubber control system shall be equipped with instrumentation to monitor the total pressure drop across the scrubber (inches of water column) and water flow rate (gpm). Such instrumentation shall be calibrated at least annually, properly maintained and operational at all times, except during periods of breakdown, repair or calibration. Exhaust from the wet scrubber stacks shall be maintained at a minimum of 213 feet in height. The permittee shall operate the wet scrubber in accordance with the CAM provisions of this subsection as well as the general provisions in Appendix H of this permit. [Rule 62-213.440(4), F.A.C.; and Permit No. PSD-FL-272B.

b. After January 30, 2016, for each boiler, the permittee shall maintain the 30-day rolling average pressure drop and the 30-day rolling average liquid flow rate at or above the lowest one-hour average pressure drop and the lowest one hour average liquid flow rate, respectively, measured during the most recent performance test demonstrating compliance with the PM emission limitation, pursuant to §63.7530(b) and Table 7 of Subpart DDDDD. [Table 4 to Subpart DDDDD of 40 CFR 63].

6. Other Control Techniques: To minimize emissions of sulfur dioxide and sulfuric acid mist, the boilers shall only fire the authorized low-sulfur fuels specified in this subsection. As provided in Appendix J of this permit, operators shall follow the good combustion practices that are generally applicable to all sugar mill boilers. [Rule 62-210.200(PTE), F.A.C.; and Permit No. PSD-FL-272B]

EMISSIONS STANDARDS

7. Opacity Standard: As determined by DEP Method 9, visible emissions from each boiler shall not exceed 30% opacity based on a six-minute average, except for one 2-minute period per hour that shall not exceed 40% opacity. This standard excludes water vapor and applies when firing any combination of authorized fuels. [Rule 62-296.410(1)(b)1, F.A.C.]

8. PM Standard: As determined by EPA Method 5, PM emissions shall not exceed 0.25 lb/MMBtu of heat input from firing bagasse plus 0.1 lb/MMBtu of heat input from firing oil. When burning a mixture of bagasse and oil, the emissions standard shall be prorated based on the portion of heat input provided from each fuel. A separate compliance test when firing only distillate oil is not required. [Rule 62-296.410(1)(b)2, F.A.C., Permit No. PSD-FL-208A]. In addition to the above, after January 30, 2016, filterable PM emissions from each boiler shall not exceed 4.4E-01 lb per MMBtu of heat input. [Table 2 to Subpart DDDDD of 40 CFR 63].

9. CO Standard: After January 30, 2016, CO emissions from each boiler shall not exceed 2,800 ppm by volume on a dry basis corrected to 3 percent oxygen, 3-run average. [Table 2 to Subpart DDDDD of 40 CFR 63]

10. HCl Standard: After January 30, 2016, HCl emissions from each boiler shall not exceed 2.2E-02 lb per MMBtu of heat input. [Table 2 to Subpart DDDDD of 40 CFR 63]

11. Mercury Standard: After January 30, 2016, Mercury emissions from each boiler shall not exceed 5.7E-06 lb MMBtu of heat input. [Table 2 to Subpart DDDDD of 40 CFR 63]

TESTING REQUIREMENTS

12. General Testing Requirements: The boilers are subject to the applicable provisions in Appendix C of this permit, which specifies the general requirements for test frequencies, test notifications, sampling facilities, test procedures, and test reports. [Rule 62-297.310, F.A.C.]

13. Test Methods: If required, stack tests shall be performed in accordance with the following methods or the most recent versions of these methods.

Method	Description of Method and Comments
1-4	Traverse Points, Velocity and Flow Rate, Gas Analysis, and Moisture Content
5	Method for Determining Particulate Matter Emissions
7, 7E	Determination of Nitrogen Oxide Emissions from Stationary Sources
9	Visual Determination of the Opacity of Emissions from Stationary Sources
10	Carbon Monoxide (CO), see Table 5 to Subpart DDDDD of 40 CFR 63 for additional details.
26 or 26A	Hydrogen chloride (HCl), see Table 5 to Subpart DDDDD of 40 CFR 63 for additional details.
29, 30A or 30B	Mercury (Hg), see Table 5 to Subpart DDDDD of 40 CFR 63 for additional details.

The above methods are specified in Appendix A of 40 CFR 60, 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. [Rules 62-204.800 and 62-297.401, F.A.C.; and 40 CFR 60, Appendix A]

14. Boiler excess oxygen levels used for combustion during NOX testing shall not be less than the boiler excess oxygen levels used for combustion during CO testing.

15. After January 30, 2016, for demonstrating compliance with emission limits for PM, CO, HCl and Hg pursuant to 40 CFR 63, Subpart DDDDD, the permittee shall:
    a. Comply with the performance testing requirements in Table 5 to Subpart DDDDD of 40 CFR 63. Performance testing may include fuel analysis for HCl and Hg, if fuel analysis is the selected method of compliance for these pollutants.
    b. Comply with the initial compliance test requirements in 40 CFR 63.7510 and 40 CFR 63.7530., and
    c. Conduct annual performance tests, fuel analysis, and tune-ups in accordance with 40 CFR 63.7515, 40 CFR 63.7520, 40 CFR 63.7521 and 40 CFR 63.7540

16. Initial Compliance Tests: The emissions units shall be tested to demonstrate initial compliance with the emissions standards for **PM and VE**. After January 30, 2016, **HCl, mercury, and CO** shall be added to this list for testing. The permittee may elect to perform compliance testing for HCl and Hg using monthly fuel analyses in accordance with 40 CFR 63.7515(e). 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.]

17. Annual Compliance Tests: During each federal fiscal year (October 1 - September 30), the permittee shall conduct compliance tests for **PM and VE** from each boiler. **NOx** testing is also required to satisfy condition 19 below. After January 30, 2016, **HCl, mercury, and CO** shall be added to this list for testing. The permittee may elect to perform compliance testing for HCl and Hg using fuel analysis. See the following condition for an alternative to the visible emissions test when there are combined plumes. For each test run, the permittee shall record the following: steam production rate, temperature and pressure; feedwater flow rate, temperature and pressure; and, at 15 minute intervals, the scrubber pressure drop and water flow rate. For each PM test run, the heat input rate shall be calculated from the steam production data and by assuming a 55% thermal efficiency for the boiler. *NOTE #1: For HCl and Hg, if each of 12 consecutive monthly fuel*

analyses demonstrate 75% (percent) or less of the applicable emission limit, fuel analyses may be reduced to quarterly. If any quarterly sample exceeds 75% (percent) of the applicable emission limit, then fuel analyses must return to monthly. NOTE #2: As allowed in 40 CFR 63.7515(b), annual testing of HCl, mercury, and CO may be reduced to every three (3) years if results for at least 2 consecutive years are less than or equal to 75% (percent) of the applicable emission limits. If the testing results in emissions greater than the 75% (percent) of the applicable emissions limits, then the testing frequency shall return to annual. [40 CFR 63.7515(c)]. According to 40 CFR 63.7520(e), for each HCl and Mercury test run, the F-Factor methodology must be used to determine compliance with the emission limits. [Rules 62-213.440(1)(b), 62-296.410(3), 62-297.310(4)(a)2, 62-297.401, F.A.C., 40 CFR 63.7515 (b), (c) and (e), 40 CFR 63.7520 (e)].

18. Combined Plumes, Alternate Method for Stack Opacity: It is possible that combined plumes from adjacent boilers will prevent a reliable determination of compliance with the opacity standard. If the permittee is unable to perform the scheduled annual visible emissions test because of combined plumes, the permittee shall record the scrubber pressure drop and water flow rate during each test run for particulate matter at 15-minute intervals. The test report shall note the attempt to perform the annual visible emissions test, the reason for not being able to complete the test and shall identify scrubber pressure drops and water flow rates recorded during each test run for particulate matter. [Rules 62-4.070(3), 62-213.440(1)(b) and 62-297.310(7)(a)4, F.A.C.]

19. The permittee shall monitor the NOx emissions from each boiler, and, using the most reliable information available, calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of *five (5)* years following resumption of regular operations after the change. Emissions shall be computed in accordance with Rule 62-210.370, F.A.C. The permittee shall report to the Department within 60 days after the end of each year during which such records must be generated, setting out each unit's annual emissions during the calendar year that preceded submission of the report. The report shall contain the following:
    a. The name, address and telephone number of the owner or operator of the major stationary source;
    b. The annual emissions as calculated pursuant to subparagraph 62-212.300(1)(e)1., F.A.C.;
    c. If the emissions differ from the preconstruction projection, an explanation as to why there is a difference; and
    d. Any other information that the owner or operator wishes to include in the report.

    [Rule 62-212.300(1)(e), F.A.C.].

MONITORING, RECORD KEEPING AND REPORTING

20. Monitoring Equipment: In accordance with the manufacturer's recommendations, the permittee shall install, operate and maintain equipment to continuously monitor the following parameters: the steam production (lb/hour), pressure (psig) and temperature (° F); the feed water flow rate (gpm), pressure (psig) and temperature (° F); the scrubber flow rate (gpm) and pressure drop (inches of water column); and the total distillate oil fired (gallons). Each device shall be calibrated at least annually and calibration records maintained in a written or electronic log. [Rule 62-213.440(4), F.A.C.; and Permit Nos. PSD-FL-272B and 0510003-039-AC]

21. Daily Operational Records: To demonstrate compliance with the performance requirements of this permit, the permittee shall record the following information in daily logs.
    a. *Boiler Operations*: The permittee shall record the time and date the boiler undergoes startup, shutdown, or malfunction. The permittee shall also log the time the boiler has achieved or regained normal operation. Chart recorders shall continuously record the steam pressure (psig), steam temperature (° F), and steam production rate (lb/hour).

b. Wet Scrubber Parameters: The wet scrubber shall be equipped with a manometer (or equivalent) to monitor the scrubber pressure drop (inches of water column) and a flow meter to monitor the scrubber water flow rate (gpm). The permittee shall comply with the applicable CAM Plan monitoring requirements in this subsection and Appendix H of this permit.

All records shall indicate the date and time the information was recorded, and in the case of manual recordings, the name of the person who recorded the information. For data that indicates operation outside of the specified permitted levels of the above parameters, the permittee shall record a summary of the incident and any corrective actions taken to regain proper operation, if any. Automated recorders may be used to satisfy the monitoring requirements.

[Rule 62-210.200(PTE), F.A.C.; and Permit No. 0510003-039-AC]

22. CAM Plan, Wet Scrubbers: The permittee shall comply with the following CAM plan for each boiler.

CAM Criteria	**Indicator #1**	**Indicator #2**
Indicator	Pressure drop across scrubber	Total scrubber water flow rate
Measurement Approach	Manometer (or equivalent)	Flow meter
Indicator Range	An excursion is defined as any pressure drop **below 6.5 inches of water column for Boiler 1 and 5.5 inches of water column for Boiler 2**. Excursions trigger inspection, corrective action, record keeping and reporting.	An excursion is defined as any flow rate **below 200 gallons per minute for each boiler**. Excursions trigger inspection, corrective action, record keeping and reporting.
Data Representativeness	Manometer measures scrubber pressure drop with a minimum accuracy of ± 0.5 inches of water column (gage).	Flow meter measures scrubber flow rate with a minimum accuracy of ± 5% of total water flow.
Verification of Operational Status	NA	NA
QA/QC Procedures	Maintain equipment in accordance with manufacturer's recommendations.	Maintain equipment in accordance with manufacturer's recommendations.
Monitoring Frequency	Continuous readout	Continuous readout
Data Collection Procedures	Recorded at 4-hour intervals.	Recorded at 4-hour intervals.
Averaging Period	NA	NA

In addition, the permittee shall comply with the general CAM provisions specified in Appendix H of this permit. Automated recorders may be installed to satisfy the recording requirements. The permittee shall record any problems with operation of the wet scrubber and corrective actions taken in the Daily Operational Records required by this permit. [Rules 62-204.800 and 62-213.440(1)(b)1.a, F.A.C.; and 40 CFR 64]

23. Fuel Monitoring Provisions: The permittee shall comply with the applicable fuel monitoring requirements specified in Appendix I (Fuel Monitoring) for each authorized fuel. [Rule 62-210.200(PTE), F.A.C.; and Permit No. 0510003-039-AC]

24. Beginning January 31, 2016, each boiler shall have installed an oxygen analyzer system meeting the requirements of 40 CFR 63, Subpart DDDDD.

25. Operating Records:

    a. *Steam Production*: The permittee shall maintain records of the steam production suitable for review.
    b. *Scrubber Parameters*: The permittee shall comply with the CAM plan specified in this subsection as well as the general provisions in Appendix H of this permit.

    [Rules 62-213.440(1)(b) and 62-213.440(1)(d)4, F.A.C.; and Permit Nos. PSD-FL-272B and 0510003-039-AC]

26. Test Notifications, Records and Reports - General Requirements: Appendix C of this permit specifies the general requirements for test notifications, records and reports. [Rule 62-297.310, F.A.C.]

APPLICABLE STATE REGULATIONS

27. Emissions units at this facility are subject to the applicable portions of the regulations specified in the following Chapters of the Florida Administrative Code: 62-4 (Permitting Requirements); 62-204 (Ambient Air Quality Requirements, PSD Increments, and Federal Regulations Adopted by Reference); 62-210 (Permits Required, Public Notice, Reports, Stack Height Policy, Circumvention, Excess Emissions, and Forms); 62-212 (Preconstruction Review, PSD Review and Best Available Control Technology. (Title V Air Operation Permits for Major Sources of Air Pollution); 62-296 (Emission Limiting Standards); and 62-297 (Test Methods and Procedures, Continuous Monitoring Specifications, and Alternate Sampling Procedures). In particular, emissions units are subject to applicable portions of the following source-specific rules.

- Boilers 1 and 2 (EU-001 & 002) are subject to Rule 62-296.410, F.A.C. for carbonaceous fuel burning equipment.
- For all emissions units requiring tests, Rule 62-297.310, F.A.C. establishes the general requirements.
- Boilers 1 and 2 (EU-001 & 002) are subject to the applicable provisions in Rule 62-213.440, F.A.C. for Compliance Assurance Monitoring:

APPLICABLE FEDERAL REGULATIONS

28. Federal environmental requirements are established in Title 40 of the Code of Federal Regulations (CFR). Emissions units are subject to the following source-specific regulations.

- Boilers 1 and 2, (EU-001& 002) are subject to the applicable provisions in 40 CFR 64 for Compliance Assurance Monitoring:
- NESHAP Provisions: Boilers 1 and 2 are subject to the National Emission Standards for HAPs, Subparts A and DDDDD in 40 CFR 63 for "Industrial-Commercial-Institutional Steam Generating Units [Rule 62-204.800, F.A.C.]

Appendix A. Citation Format and Glossary

Appendix B. Identification of Primary State and Federal Regulations

Appendix C. General Testing Requirements

Appendix H. Compliance Assurance Monitoring Plan, General Provisions

Appendix I. Fuel Monitoring

Appendix J. Good Combustion Practices for All Boilers

Appendix K. Startup, Shutdown and Malfunction Plans for Mill Boilers

Appendix O. 40 CFR 63 Subparts A and DDDDD