FINAL DETERMINATION

PERMITTEE

United States Sugar Corporation
111 Ponce De Leon Avenue
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. 0510003-058-AC
Air Construction Permit
U.S. Sugar Clewiston Facility
Upgrade OFA Systems for
Boiler Nos. 1 and 2

This air construction permit 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 more complete mixing of combustion air and fuel will provide greater carbon burnout, thereby lowering CO emissions.

NOTICE AND PUBLICATION

The Department distributed a draft minor source air construction permit package on June 6, 2014. The applicant published the Public Notice in the Clewiston News Newspaper on June 12, 2014. The Department received the proof of publication on June 16, 2014. 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 Local Air Program, the Department's South District Office or the EPA Region 4 Office. However minor comments were received from the applicant.

1. Applicant Comment

On June 3, 2014, the Department received comments from the applicant. The following summarizes the comments and the Department's response.

Ref. Condition 17. Add reference to 40 CFR 63.7515(b) and (c), which give provisions for reduced testing frequency based on the stack test results, 40 CFR 63.7515(e) which gives requirements for ongoing fuel analysis, and 40 CFR 63.7520(e) which requires the use of an f-factor in determining compliance with the emission limits.

Annual Compliance Test 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. After January 30, 2016, HCl, mercury, and CO shall be added to this list for testing. ***As allowed in 40 CFR 63.7515(b), annual testing of HCl, mercury, and CO may be reduced to every three years if results are less than 75 percent of the applicable emission limits. If the testing results in emissions greater than 75 percent of the applicable emission limits, then the testing frequency will return to annual (40 CFR 63.7515(c).***

The permittee may elect to perform compliance testing for HCl and Hg using ***monthly*** fuel analysis ***as required in 40 CF$ 63.7515(e)***. ***If each of 12 consecutive monthly fuel analysis demonstrate 75 percent or less of the applicable emission limit, fuel analysis may be reduced to quarterly. If any quarterly sample exceeds 75 percent of the applicable emission limit, then fuel analysis must return to monthly.***

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. ***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 and 62-297.401, F.A.C.; ***40 CFR 63.7515(b), (c), and (e); 40 CFR 63.7520(e)***]

Response: Conceptually agreed and these changes are addressed in the final permit.

2. Applicant Comment

Condition 19: This condition requires reporting of annual NOx emissions for a period of 10 years as required under Rule 62-212.300(1)(e), F.A.C. Rule 62-212.300(1)(e)1., F.A.C. states:

The permittee shall monitor the emissions of any PSD pollutant that the Department identifies could increase as a result of the construction or modification and that is emitted by any emissions unit that could be affected; 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 5 years following resumption of regular operations after the change, or for a period of 10 years following resumption of regular operations if the change increases the design capacity of that emissions unit or its potential to emit that PSD pollutant. Emissions shall be computed in accordance with Rule 62-210.370, F.A.C.

The modifications to the OFA systems will not increase the design capacity of Boiler Nos. 1 and 2 (as stated in the application, the technical evaluation, and in the draft permit). Therefore the reporting period in condition 19 should be 5 years.

Response: Although there may be a possible increase in the potential to emit NOx, the Department concurs that five years of testing should be sufficient and the requested change is added to the permit.

3. Applicant Comment

Condition 27: Hendry County is classified as an attainment area, therefore non-attainment area review and lowest achievable emission rate are not applicable. Please remove these references.

Condition 27: The temporary rental refinery package boiler is not part of this application.

Response: *Agreed and references removed.*

4. Applicant Comment

Condition 28: Boiler Nos. 1 and 2 are not subject to any NSPS, and the OFA modifications will not cause the boilers to be subject to any NSPS. Please remove the reference to 40 CFR 60 Subpart A.

Response: *Agreed and references removed.*

5. Applicant Comment

Appendices: This is an air construction permit, not a Title V permit. Please include only the appendices that are applicable to this construction permit. These appendices are:

- Appendix A
- Appendix B
- Appendix C
- Appendix H
- Appendix I
- Appendix J
- Appendix K
- Appendix O (just 40 CFR 63 Subpart DDDDD)

Response: *Agreed except that 40 CFR 63 Subpart A is also needed. The appendices are corrected.*

6. Applicant Comment

Technical Evaluation Table A: PM demand growth excluded emissions should be 13.63 TPY (not 13.62 TPY)

Response: *Agreed and corrected on the Technical Evaluation.*

7. Applicant Comment

Technical Evaluation Applicable State Regulations: Please remove references to non-attainment area review and lowest achievable emission rate and also remove the reference to the temporary rental refinery package boiler.

Response: *Agreed and corrected to the Technical Evaluation.*

8. Applicant Comment

Technical Evaluation Applicable Federal Regulations: Please remove reference to NSPS

Response: *Agreed and reference to NSPS is removed from the Technical Evaluation.*

CONCLUSION

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