STATEMENT OF BASIS

Title V Air Operation Permit Renewal
Permit No. 0990019-012-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, 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.

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 renew the existing Title V permit for the above referenced facility.

PROCESSING SCHEDULE AND RELATED DOCUMENTS

Renewal received September 4, 2013
Additional Information Request dated October 11, 2012
Additional Information Response received January 9, 2013
Additional Information Request dated January 18, 2013
Additional Information Response received January 31, 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 operate 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 EUs 002, 003, 004, 005 and 006 for emissions of PM. PM emissions are being controlled by wet scrubbers.

PROJECT REVIEW

The Title V renewal application requested the following change to be made to the permit: changing Boiler No. 3 and Boiler No. 6 mass emission limits to reflect the construction permits and removal of oily materials as a fuel for the boilers. These changes as requested were made in renewal permit. The application also requested a reduction in NOx and VOC test frequency for Boiler Nos. 2, 4 and 5. Boiler Nos. 2, 4 and 5 are subject to 62-296.500, and 62-296.500, F.A.C., Reasonable Available Control Technology (RACT) – Requirements for VOC and NOx Emitting Facilities and Reasonable Available Control Technology (RACT) – Requirements for Major VOC and NOx Emitting Facilities, respectively. Rule 62-296.570(4)(a)3, F.A.C. requires annual testing for VOC and NOx for units that not equipped with CEMs. Boiler Nos. 2, 4 and 5 are not equipped with CEMs. Therefore, the request to reduce the VOC and NOx testing frequency is denied.

Other changes made to this permit include:

a) reformatting to the new Title V permit format,
b) replacement of TV-6 with new Appendix TV,
c) streamlining of EU sections combining emissions units with common conditions and by moving common conditions to the new appendices,
d) incorporation of air construction permit No. 0990019-013-AC,
e) revision to CAM plan and indicator ranges. The CAM submitted with the renewal application was requested to be revised in the Department's October 11, 2012 letter requesting additional information for the application. A revised CAM plan was submitted on January 9, 2013. On January 18, the Department requested additional information by email for the revised CAM plan. On January 31 the Department, Osceola Farms and Golder Associates attended a teleconference to discuss the Department's requested additional information for the CAM plan. During that teleconference, the attending parties agreed to the revised performance indicators stated in this renewal permit.
f) reassigning emission units and activities designated as unregulated to be designated as insignificant. The previously designated emissions units/activities did not have rule applicability and, if the activities under each emissions unit number is reviewed individually, would not potentially have the potential to emit greater than 5 TPY.

The renewal application also stated that the water flow meters placement as specified in Permit No. 0990019-010-AV was deviated from due to physical and operational constraints of the boilers, meters, and water pipe length. The Department has accepted the revised configuration and has incorporated revised language in the permit for Boilers Nos. 2, 4 and 5.

CONCLUSION

This project renews Title V air operation permit No. 0990019-008-AV, which was issued on April 15, 2008. This renewal is issued under the provisions of Chapter 403, Florida Statues (F.S.), and Chapters 62-4, 62-210 and 62-213, F.A.C.