FINAL DETERMINATION

PERMITTEE

Osceola Farms Company
32298 State Road 700
Pahokee, Florida 33476

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. 0990019-015-AC
Modification to a Major Facility Air Construction Permit
Osceola Farms Company

This permit authorizes Osceola Farms to make modifications to five (5) existing boilers (Boilers No. 2, 3, 4, 5 and 6) to comply with Boiler MACT carbon monoxide (CO) emission limits. As part of the new OFA systems, the bagasse fuel feeders are to be replaced to reduce the intrusion of cold air into the furnace. New No. 6 fuel oil burners will be installed for Boiler No. 6, and a new ash removal system will be installed for Boiler Nos. 2, 3 and 6. The new ash removal systems will include a bottom ash conveyor and screw conveyors below the ash hoppers.

a) Boilers Nos. 2, 3 and 6 – Modern OFA (Over Fire Air) systems are needed to reduce CO emissions to comply with MACT emission limits for CO. As part of the new OFA systems, the bagasse fuel feeders will be replaced to reduce the intrusion of cold air into the furnace. No other changes are proposed.

b) Boiler Nos. 4 and 5 – These boilers do not currently employ grates. These boilers will be converted to inclined pinhole grate boilers by installing grates, new fuel feeders, new ash conveyance systems and other associated equipment. In addition, modern OFA systems for these boilers will be installed to ensure compliance with the CO limit. The boilers also will be converted to higher pressure boilers to match Boilers Nos. 2, 3 and 6. The converted boilers will be designed to operate at 350 psig and 600 degree F. steam conditions. To accomplish this change, the boiler steam drums will be replaced, new superheaters will be installed to replace the existing superheaters, and the generating bank, rear wall and floor steam tubes will be replaced

NOTICE AND PUBLICATION

The Department distributed a draft modification air construction permit package on February 10, 2014. The applicant published the Public Notice in the Palm Beach Post on February 23, 2014. The Department received the proof of publication on February 28, 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, comments were received from the applicant as noted below:

Applicant

On March 4, 2014, the Department received comments from the applicant. The following summarizes the comments and the Department's response.

1. Summary of comments.

Draft Permit

Cover Page (Page 1 of 24): The description should be revised to include that new No. 6 fuel oil burners will be installed for Boiler No. 6, and a new ash removal system will be installed for Boiler Nos. 2, 3, and 6.

Response: Description revised accordingly.

Page 4 of 24. Proposed Project: The description should be revised to include that new No. 6 fuel oil burners will be installed for Boiler No. 6, and new ash removal system will be installed for Boiler Nos. 2, 3, and 6.

Response: Description revised accordingly.

Section A. Boiler Nos. 2, 3 and 6

Page 7 of 24. Equipment. Condition 1: The description should be revised to include that new No. 6 fuel oil burners will be installed for Boiler No. 6, and new ash removal system will be installed for Boiler Nos. 2, 3 and 6.

Response: Description revised accordingly.

Condition 2. Permitted Capacity: Permitting note – the permitting note states "This boiler is subject to 40 CFR 63, Subpart DDDDD". This should read "Boiler Nos. 2, 3 and 6 are each subject to 40 CFR 63, Subpart DDDDD".

Response: Description revised accordingly.

Page 7 0f 24: Authorized Fuel: Osceola requested that statement be made at end of condition regarding specific numbers of 60%, 1.6%, 40% and 0.96%. May not be met exactly due to fuel variability and inaccuracies in the blending process.

Response: Description revised accordingly, however the following clarification note is added: The percentage of blends is approximate, however, ***Do not exceed 60% of any synthetic bio-fuel to the fuel blend formula.***

Page 8 of 24. Condition 3.iii and iv. The referenced appendices (Wood -001) and SSP) are not attached to the permit and it is recommended that these conditions should refer to the current Title V permit No. 0990019-012-AV.

Response: The condition is revised to refer the condition to the current Title V permit No. 0990019-012-AV as requested.

Page 14 of 24. Oxygen Measurement Device: Currently only Boiler Nos. 3 and 6 are required to have O2 monitors by permit condition. Beginning January 30, 2016, the Boiler MACT rule will require all boilers to have an oxygen analyzer system. Therefore, the wording should be revised as follows: *Boilers Nos. 3 and 6 shall be equipped with a device to measure oxygen. Beginning January 30, 2016, Boiler Nos. 2, 3 and 6 shall each have installed an oxygen analyzer system meeting the requirements of 40 CFR 63, Subpart DDDDD.*

Response: Statement revised accordingly.

Section B. Boiler Nos. 4 and 5

Page 16 of 24. Authorized fuel. Condition 3, ii: : Osceola requested that statement be made at end of condition regarding specific numbers of 60%, 1.6%, 40% and 0.96%. May not be met exactly due to fuel variability and inaccuracies in the blending process.

Response: Description revised accordingly, however the following clarification note is added: The percentage of blends is approximate, however, ***Do not exceed 60% of any synthetic bio-fuel to the fuel blend formula.***

Page 17 of 24. Authorized Fuel. Condition 3.iii and iv. The referenced appendices (Wood -001) and SSP) are not attached to the permit and it is recommended that these conditions should refer to the current Title V permit No. 0990019-012-AV.

Response: The condition is revised to refer the condition to the current Title V permit No. 0990019-012-AV as requested.

Page 19 of 24. Testing Requirements. Condition 8.3 Item a, "analysis" is misspelled.

Response: Spelling is corrected.

Page 22 of 24. To be consistent with Section A for Boiler Nos. 2, 3 and 6, it is recommended that a condition be added addressing the requirement for Oxygen Analyzer system for Boiler Nos. 4 and 5: *Beginning January 30, 2016, Boiler Nos. 4 and 5 shall each have installed an oxygen analyzer system meeting the requirements of 40 CFR 63, Subpart DDDDD.*

Response: Condition added as requested.

CONCLUSION

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