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South District Office
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Fort Myers, Florida 33902-2549

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Lt. Governor

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Secretary

PERMIT REVISION and MODIFICATION

September 23, 2011

CERTIFIED MAIL 7010 1870 0001 8477 6764
RETURN RECEIPT REQUESTED

PERMITTEE

Sugar Cane Growers Cooperative of Florida
1500 West Sugar House Road
Belle Glade, Florida 33430

Authorized Representative:
Mr. Jose F. Alvarez
Executive VP Operations & General Manager

Air Permit Nos. 0990026-015-AC/PSD-FL-077A
Permit Expires: **March 22, 2012**
Minor Air Construction Permit
Sugar Cane Growers Cooperative of Florida
Revision of Permit No. AC50-42476/PSD-FL-077A
Modification of Permit No. 0990026-011-AC

PROJECT

This is the final air construction permit which revises Permit No. AC50-42476 (PSD-FL-077) for the following items: reduction in control equipment monitoring and adding additional test methods for VOC emissions. This permit also revises several specific conditions of Permit No. 0990026-011-AC as well as authorizes an alternate method for stack opacity and installation of water meters just prior to each of Boiler No. 4 and 5's scrubbers. Sugar Cane Growers Cooperative of Florida is a sugar mill (Standard Industrial Classification No. 2061). The facility is located in Palm Beach County at 1500 West Sugar House Road, Belle Glade, Florida 33430, Florida. The UTM coordinates are Zone 17, 534.9 km East, and 2953.3 km North.

This final permit is organized into the following sections: Section 1 (General Information), Section 2 (Permit Revisions) and Section 3 (Modifications). As noted in the Final Determination provided with this final permit, only minor changes and clarifications were made to the draft permit.

STATEMENT OF BASIS

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.). 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. A copy of this permit modification shall be filed with the referenced permit and shall become part of the permit.

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

_____ _____
Jon M. Iglehart Date
Director of
District Management

JMI/SRM/jw

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 Revision) was sent by certified mail (*) and 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 _____to the persons listed below.

Mr. Jose F. Alvarez, Sugar Cane Growers Co-op*: jfalvarez@scgc.org
Ms. Kathy Lockhart, Sugar Cane Growers Co-op: kdlockhart@scgc.org
Mr. David A. Buff, P.E., Golder Associates Inc.: dbuff@golder.com
Mr. James Stormer, Palm Beach County Health Department: james_stormer@doh.state.fl.us
Tammy McWade, DEP Tallahassee: tammy.mcwade@dep.state.fl.us

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.

_____ _____
(Clerk) (Date)

FACILITY DESCRIPTION

The existing facility is a sugar mill (Standard Industrial Classification No. 2061), which consists of the following emissions units and activities:

EU No.	Brief Description
Regulated Emissions Units	
001	Boiler No. 1
002	Boiler No. 2
003	Boiler No. 3
004	Boiler No. 4
005	Boiler No. 5
006	Boiler No. 8
007	Spray Booth

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.

PROPOSED PROJECT

The proposed project revises specific condition Nos. 6 and 9 of Permit No. AC 50-42476/PSD-FL-077 by reducing required monitoring on emissions unit 006 (Boiler No. 8) and authorizing additional test methods for emissions unit 006 (Boiler No. 8) VOC emissions. This project revises multiple specific conditions of Permit No. 099026-011-AC, authorizes an alternate method for stack opacity and installation of water meters on each of the two scrubbers associated with Boiler No. 4 and the two scrubbers associated with Boiler No. 5.

- 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.

SECTION 2. PERMIT REVISIONS

The following permit conditions are revised as indicated.

Permit Being Revised: Permit No. AC 50-42476 (PSD-FL-077)

Affected Emissions Units: EU006

Specific Condition 6: This condition is revised to read as follows:

6. Compliance with the emission limits required in condition No. 2 shall be determined by performance tests. Particulate matter emissions tests shall be made while burning bagasse only and residue only with the minimal amounts of fuel oil necessary to reach test capacity. These tests are to determine compliance with the SO_2 emission limits of 299 lb/hr from non-fossil fuel while burning residue, and 152 lb/hr from non-fossil fuel while burning bagasse. The test method for VOC shall be EPA Method 25 or EPA method 25A modified to incorporate a sample dilution system as approved by the Department under the provisions of Rule 62-297.620, F.A.C. If EPA Method 25A is employed, EPA Method 18 may be used to quantify and subtract the methane fraction in the exhaust gases. Each test run shall be conducted in accordance with 40 CFR 60 Appendix A using the method specified. The boiler shall be at or near to full operating capacity during all performance tests. The performance tests shall be conducted in accordance with EPA reference methods (40 CFR 60, Appendix A) and the provisions of 40 CFR 60.8 and 40 CFR 60.46. [Permit Nos. 0990026-015-AC/PSD-FL-077A]

Specific Condition 9: This condition is revised to read as follows:

9. Each scrubber shall be equipped with a manometer or equivalent instrument to measure the total pressure drop of the flue gas stream across each scrubber and with a flow meter or equivalent device (weir) to measure the total quantity of water flow to each scrubber. Data from these instruments shall be recorded each shift (every 8 hours) and available for regulatory agencies inspection for five years. [Rule 62-210.200(PTE) and Permit No. 0990026-015-AC/PSD-FL-077A]

Permit Being Revised: Permit No. 0990026-011-AC

Affected Emissions Units: EU001, EU002, EU003, EU004, EU005

Specific Condition A.1: This condition is revised to read as follows:

A.1. Permitted Capacity. The permitted capacity for operating steam production rate is 139,700 pounds per hour (24-hour average) at 400 psig and 585 ºF (or thermodynamically equivalent) is used to establish a 100% load for testing purposes. [Rules 62-4.160(2) and 62-210.200 (PTE), F.A.C.; Permit No. 0990026-015-AC]

Specific Condition A.2: This condition is revised to read as follows:

A.2. Methods of Operation - Boiler No. 1 is fired with carbonaceous fuel (bagasse and residue), No. 6 residual oil, small quantities of on-spec used oil, and small quantities of non-hazardous waste contaminated soil generated on-site. [Rule 62-213.410, F.A.C., Permit No. 0990026-015-AC]

Specific Condition A.5: This condition is revised to read as follows:

A.5. Particulate Matter - PM emissions shall not exceed 0.25 pounds per million Btu of heat input of carbonaceous fuel plus 0.1 pounds per million Btu heat input of fossil fuel.
[Permit Nos. 0990026-015-AC and PSD-FL-077/AC50-42476]

Specific Condition A.6: This condition is revised to read as follows.

A.6. Volatile Organic Compounds (VOC) - Emissions of VOC from Boiler No. 1 shall not exceed 0.7 pounds per million Btu heat input. [Rules 62-296.570(4)(b)6. and 62-296.570(2), F.A.C., Permit No. 0990026-015-AC]

Specific Condition A.7: This condition is revised to read as follows.

A.7. Nitrogen Oxides (NO_x) - Emissions of NO_x from Boiler No. 1 shall not exceed 0.45 pounds per million Btu heat input when burning bagasse. Emission rates from burning residue shall not exceed 0.65 lb/MMBtu heat input. [Rules 62-296.570(4)(b)6. and 62-296.570(2), F.A.C., Permit No. 0990026-015-AC]

Specific Condition A.8: This condition is hereby deleted.

Specific Condition A.13: This condition is hereby deleted.

Specific Condition B.1: This condition is revised to read as follows.

B.1. Permitted Capacity. The permitted capacity for operating steam production rate is 138,154 lb/hr (24-hour average) at 400 psig and 585 ºF (or thermodynamically equivalent) is used to establish a 100% load for testing purposes. [Rules 62-4.160(2) and 62-210.200 (PTE), F.A.C.; Permit No. 0990026-015-AC]

Specific Condition B.2: This condition is revised to read as follows.

B.2. Methods of Operation - Boiler No. 2 is fired with carbonaceous fuel (bagasse and residue), No. 6 residual oil, small quantities of on-spec used oil, and small quantities of non-hazardous waste contaminated soil generated on-site. [Permit No. 0990026-015-AC]

Specific Condition B.5: This condition is revised to read as follows.

B.5. Particulate Matter - 0.25 pounds per million Btu of heat input of carbonaceous fuel plus 0.1 pounds per million Btu heat input of fossil fuel. [Permit Nos. AC50-42476\PSD-FL-077 and 0990026-015-AC]

Specific Condition B.6: This condition is revised to read as follows.

B.6. Volatile Organic Compounds (VOC) - Emissions of VOC from Boiler No. 2 shall not exceed 0.7 pounds per million Btu heat input. [Rules 62-296.570(4)(b)6. and 62-296.570(2), F.A.C. and Permit No. 0990026-015-AC]

Specific Condition B.7: This condition is revised to read as follows.

B.7. Nitrogen Oxides (NO_x) - Emissions of NO_x from Boiler No. 2 shall not exceed 0.45 pounds per million Btu heat input when burning bagasse. Emissions of NO_x from burning residue shall not exceed 0.65 lb/MMBtu heat input. [Rules 62-296.570(4)(b)6. and 62-296.570(2), F.A.C. and Permit No. 0990026-015-AC]

Specific Condition B.8: This condition is hereby deleted.

Specific Condition B.13: This condition is revised to read as follows.

B.13. The scrubber control system shall be equipped with instrumentation to monitor total pressure drop and total water flow. Such instrumentation shall be properly maintained so as to be functional at all times. [Permit No. 0990026-015-AC]

Specific Condition C.1: This condition is revised to read as follows.

C.1. Permitted Capacity - The maximum steam production rate is 110,000 pounds per hour (8-hour block average) at the design operating conditions of 400 psig and 585°F (or thermodynamic equivalent). [Rules 62-4.160(2) and 62-210.200 (PTE), F.A.C.; Permit No. 0990026-015-AC]

Specific Condition C.2: This condition is revised to read as follows.

C.2. Methods of Operation - Boiler No. 3 is fired with carbonaceous fuel (bagasse and residue), and No. 6 residual oil, small quantities of on-spec used oil, and small quantities of non-hazardous waste contaminated soil generated on-site. [Permit No. 0990026-015-AC]

Specific Condition C.6. This condition is revised to read as follows:

C.6. Volatile Organic Compounds (VOC) – Emission for VOC from Boiler no. 3 shall not exceed 0.7 pounds per million Btu heat input. [Permit No. 0990026-015-AC]

Specific Condition C.8: This condition is hereby deleted.

Specific Condition C.13: This condition is revised to read as follows.

C.13. The scrubber control system shall be equipped with instrumentation to monitor total pressure drop and total water flow rate. Such instrumentation shall be properly maintained so as to be functional at all times. [Permit No. 0990026-015-AC]

Specific Condition C.14: This condition is hereby deleted.

Specific Condition D.1: This condition is revised to read as follows.

D.1. Permitted Capacity. The operating steam production rate of 300,000 pounds per hour (24-hour average) at 400 psig and 585 ºF (or thermodynamically equivalent) is used to establish a 100% load for testing purposes. -[Rules 62-4.160(2) and 62-210.200 (PTE), F.A.C.; Permit No. 0990026-015-AC]

Specific Condition D.2: This condition is revised to read as follows.

D.2. Methods of Operation - Boiler No. 4 is fired with carbonaceous fuel (bagasse and residue), No. 6 residual oil, small quantities of on-spec used oil, and small quantities of non-hazardous waste contaminated soil generated on-site. [Rule 62-213.410, F.A.C., Permit No. 0990026-015-AC]

Specific Condition D.5. This condition is revised to read as follows:

D.5. Particulate Matter. – Particulate matter emissions shall not exceed 0.20 pounds per million Btu of heat input of carbonaceous fuel plus 0.1 pounds per million Btu heat input of fossil fuel. [Permit No. 0990026-015-AC]

Specific Condition D.6: This condition is revised to read as follows.

D.6. Volatile Organic Compounds (VOC) - Emissions of VOC from Boiler No. 4 shall not exceed 0.7 pounds per million Btu heat input. [Rules 62-296.570(4)(b)6. and 62-296.570(2), F.A.C., Permit No. 0990026-015-AC]

Specific Condition D.7: This condition is revised to read as follows.

D.7. Nitrogen Oxides (NO_x) - Emissions of NO_x from Boiler No. 4 shall not exceed 0.45 pounds per million Btu heat input when burning bagasse. Emissions of NO_x from burning residue shall not exceed 0.65 lb/MMBtu heat input. [Permit No. 0990026-015-AC]

Specific Condition D.8: This condition is hereby deleted.

Specific Conditions D.9, A.9., B.9., C.9., E.9.: These conditions are revised to read as follows.

Compliance with the emission limits for PM, VOC and NO_X shall be determined by computing the heat input from the steam output (pounds per hour) and net steam enthalpy, assuming a thermal efficiency of 55 percent with bagasse and 62.5% with residue or fuel oil. [Permit No. 0990026-015-AC]

Specific Condition D.13: This condition is revised to read as follows.

D.13. Each scrubber control system shall be equipped with instrumentation to monitor total pressure drop and total water flow. Such instrumentation shall be properly maintained so as to be functional at all times. [Permit No. 0990026-015-AC]

Specific Condition E.1: This condition is revised to read as follows.

E.1. Permitted Capacity. - The steam production rate of 230,000 pounds per hour (24-hour average) at 400 psig and 585 ºF (or thermodynamically equivalent) is used to establish a 100% load for testing purposes. [Rules 62-4.160(2) and 62-210.200 (PTE), F.A.C.; Permit No. 0990026-015-AC]

Specific Condition E.2: This condition is revised to read as follows.

E.2. Methods of Operation - Boiler No. 5 is fired with carbonaceous fuel (bagasse and residue), No. 6 residual oil, small quantities of on-spec used oil, and small quantities of non-hazardous waste contaminated soil generated on-site. [Rule 62-213.410, F.A.C., Permit No. 0990026-015-AC]

Specific Condition E.6: This condition is revised to read as follows.

E.6. Volatile Organic Compounds (VOC) - Emissions of VOC from Boiler No. 5 shall not exceed 0.7 pounds per million Btu heat input. [Rule 62-296.570, F.A.C., Permit No. 0990026-015-AC]

Specific Condition E.7: This condition is revised to read as follows.

E.7. Nitrogen Oxides (NO_x) - Emissions of NO_x from Boiler No. 5 shall not exceed 0.45 MMBtu heat input when burning bagasse. Emissions of NO_x from burning residue shall not exceed 0.65 lb/MMBtu heat input. [Rules 62-296.570(4)(b)6. and 62-296.570(2), F.A.C., [Permit No. 0990026-015-AC]

Specific Condition E.8: This condition is hereby deleted.

Specific Condition E.13: This condition is revised to read as follows.

E.13.-The scrubber control system shall be equipped with instrumentation to monitor total pressure drop and total water flow. Such instrumentation shall be properly maintained so as to be functional at all times. [Permit No. 0990026-015-AC]

Specific Condition F.1: This condition is revised to read as follows.

F.1.2. Permitted Capacity. The maximum fuel oil consumption for Boiler No. 8 is limited to the quantity equivalent to 250 MMBtu/hr (1667 gallons per hour, if the heating value of the fuel oil is 18,500 Btu per pound). [Rules 62-4.160(2) and 62-210.200 (PTE), F.A.C., and Construction Permit AC50-42476\PSD-FL-077 dated 10/28/81; Permit No. 0990026-015-AC]

Specific Condition F.2: This condition is revised to read as follows.

F.2. Methods of Operation - Boiler No. 8 is fired with carbonaceous fuel (bagasse and residue), and No. 6 residual oil, small quantities of on-spec used oil, and small quantities of non-hazardous waste contaminated soil generated on-site. [Rule 62-213.410, F.A.C.; Permit No. 0990026-015-AC]

Specific Condition F.14: This condition is hereby deleted.

Specific Condition F.15: This condition is revised to read as follows.

F.15. The permittee shall install, maintain, and operate an alarm system on Boiler 8 that will be triggered whenever the boiler oxygen level drops below 4 percent. The time the boiler operates with less than 4 percent oxygen shall be logged and may be used as a basis to modify the operation and maintenance plan. The permittee shall use the Operation and Maintenance Plan for carbon monoxide control in Boiler No. 8. [Permit No. AC50-250421\PSD-FL-213 dated 06/04/96; Permit No. 0990026-015-AC\PSD-FL-077A]

Specific Condition G.1: This condition is hereby deleted.

Specific Condition G.3: This condition is hereby deleted.

Specific Condition G.5: This condition is hereby deleted.

Specific Condition G.6: This condition is hereby deleted.

Specific Condition G.7: This condition is revised to read as follows.

G.7. The permittee shall record and maintain records of the following:

a) The number of hours that the spray booth is in use (actual) on a daily basis;
b) The dates of operation;
c) A monthly inventory of the VOC and HAP containing materials, solvents and HAP containing materials used in the spray booth (EU007). The monthly inventory shall utilize the mass balance approach. The permittee shall calculate the VOCs emitted on a monthly basis by assuming that all VOCs and HAP in the coatings and cleanup solvents are evaporated. The mass fraction of VOCs and HAP from each coating material (and cleanup solvents) shall be determined from the MSDS supplied from the vendors. The monthly inventory recordkeeping shall include the identification of all VOC and HAP containing material, the amount of material used, the percent or by weight composition of VOC or HAP in each material from the MSDS, and the monthly total amount of VOC and HAP emitted.

[Construction Permit AC50-222810 dated 2/16/93; Permit No. 0990026-015-AC]

Specific Condition H.2.1: This condition is hereby deleted.

Specific Condition H.5.1: This condition is revised to read as follows.

H.5.1. Annual Compliance Tests Required. During each federal fiscal year (October 1st to September 30th), EU001, EU002, EU003, EU004, EU005 and EU006 shall be tested to demonstrate compliance with the emissions standards for **VE, PM, NO_X, and VOC**. [Rule 62-297.310(7), F.A.C. and Permit No. 0990026-011-AC]

Specific Condition H.8.2: This condition is hereby deleted.

The following attachments are hereby deleted from Permit No. 0990026-011-AC:

a. Appendix I-1, List of Insignificant Emissions Units and/or Activities.
b. Appendix I-1, List of Insignificant Emissions Units and/or Activities.
c. ATTACHMENT GSH-EU1-F1.8b
d. ATTACHMENT GSH-EU2-F1.8b
e. ATTACHMENT GSH-EU3-F1.8b
f. ATTACHMENT GSH-EU4-F1.8a
g. ATTACHMENT GSH-EU5-F1.8a
h. ATTACHMENT GSH-EU6-F1.8
i. Appendix SU-1
j. Sugar Cane Growers Cooperative of Florida
k. Procedure for Startup of Boilers 1, 2, 3, 4, 5, and 8.

This section of the permit addresses the following emissions units.

ID No.	Emission Unit Description
001	Boiler No. 1
002	Boiler No. 2
003	Boiler No. 3
004	Boiler No. 4
005	Boiler No. 5
006	Boiler No. 8

1. Required Water Meter Installation. The owner or operator shall install and maintain water flow meters just prior to each individual scrubber associated with Boilers No. 4 and No. 5. Each of the two (2) scrubbers for Boiler No. 4 and each of the two (2) scrubbers for Boiler No. 5 shall be equipped with its own water flow meter. The water flow rate to each scrubber shall be continuously measured. The water meters shall be installed before the beginning of the 2012 crop season or before October 12, 2012, whichever comes first. The water flow rate to each scrubber shall be continuously monitored. [Permit No. 0990026-015-AC]

   {Permitting Note: Boilers No. 1, No. 2 and No. 3 each have only one scrubber that is equipped with a continuously measuring water flow meter. Boiler 8 has two scrubbers, each of which has a dedicated water flow meter.}

2. 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 the 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), 62-297.310(7)(a)(4), 62-213.440(1)(b), F.A.C.; Permit No. 0990026-015-AC]

3. Scrubber Monitoring Equipment. Each scrubber control system for EU001 shall be equipped with instrumentation to monitor total pressure drop and total water flow. Such instrumentation shall be properly maintained so as to be functional at all times. [Permit No. 0990026-015-AC]

Excess Emissions

Rule 62-210.700 (Excess Emissions), F.A.C. cannot vary any requirement of an NSPS, NESHAP or Acid Rain program provision.

4. Excess Emissions Allowed. Excess emissions resulting from malfunction shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration. [Rule 62-210.700(1), F.A.C. and Permit No. 0990026-015-AC]

5. Excess Emissions Prohibited. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown or malfunction shall be prohibited. [Rule 62-210.700(4), F.A.C. and Permit No. 0990026-015-AC]

6. Reporting of Excess Emissions. In case of excess emissions resulting from malfunctions, each owner or operator shall notify the Department in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department. [Rule 62-210.700(6), F.A.C. and Permit No. 0990026-015-AC]