PERMITTEE

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

PERMITTING AUTHORITY

Florida Department of Environmental Protection
Air Resource Section
South District Office
2295 Victoria Avenue, Suite 364
Fort Myers, Florida 33902-2549

PROJECT

Air Permit Nos. 0990026-015-AC/PSD-FL-077A
Sugar Cane Growers Cooperative of Florida

This project revises Permit No. 0990026-011-AC to remove specific conditions that are only applicable for Title V permits and not for air construction permits. Some of the removed specific conditions are "living" requirements, such as the CAM plan and monitoring, and therefore subject to review and revision during renewal of the Title V operating permit. The revision of 0990026-011-AC also removed conditions that did not have an AC basis but were added to the Title V operating permit.

This project also revises PSD-FL-077 to decrease required monitoring imposed by condition # 9 and added alternative test methods for VOC testing required by condition # 6.

NOTICE AND PUBLICATION

The Department distributed a draft minor source air construction permit package on August 23, 2011. The applicant published the Public Notice in The Sun newspaper on September 1, 2011. The Department received the proof of publication on September 16, 2011. No requests for administrative hearings or requests for extensions of time to file a petition for administrative hearing were received.

COMMENTS

Applicant

On September 14, 2011, the Department received comments from the applicant. The following summarizes the comments and the Department's response.

1. *Comment*: Condition B.6. needs to clarify measurements to be measured are for *each* scrubber.

   Response: Department agrees. The condition have been changed to state *each* scrubber.

2. *Comment*: Conditions A.2., B.2., C.2., D.2., E.2., and F.2. should include "small quantities of contaminated soil that is generated on-site."

   Response: Department agrees. The condition has been changed to state "small quantities of non-hazardous waste contaminated soil that is generated on-site."

3. *Comment*: Condition D.13. and E.13 should be revised to be consistent with Condition A.5. of the Title V permit.

   Response: The Department disagrees. Conditions D.13 and E.13 are consistent with Condition A.18 in the Title V permit. Conditions D.13 and E.13 are stating that each scrubber shall be equipped with instrumentation to monitor pressure drop and water flow. Condition A.5. in the Title V permit is requiring installation of instrumentation to monitor pressure drop and water flow on each scrubber associated with Boiler 4 and Boiler

5. Condition A.5 in the Title V permit is Condition 1 is Section 3 in Permit No. 0990026-015-AC/PSD-FL-077A.

4. *Comment*: Section 3. Condition 1. Delete reference to Boiler 8 as it has water flow meters already installed, one on each scrubber.

   Response: Department agrees. Condition has been changed.

5. *Comment*: It is requested to add EPA Method 25A and EPA method 18 to Condition B.27 in the Title V permit 0990026-016-AV so that Boiler No. 8 VOC emissions test methods is consistent with the VOC test methods for Boiler Nos. 1 thru 5.

   Response: Department agrees. This requires a revision to the Permit No. PSD-FL-077/AC50-42476. The condition has been changed.

Department

1. The Department has corrected minor typographical and grammatical errors.
2. The Department became aware that there were two conflicting conditions regarding fuel monitoring in the Title V renewal permit 0990026-016-AV which were in air construction permit 0990026-011-AC. The Department has included in the AC permit 0990026-015-AC the deletion of Conditions A.8., B.8., C.8., D.8., E.8., and H.2.1 which require the recording of fuel oil use every 8 hours. The facility is still required to continuously measure the total amount of fuel oil used by Boiler 1 thru 5 combined and the amount used by Boiler 8 in order to comply with the 14 tons per day limit. The owner or operator is required to record each days fuel usage.

CONCLUSION

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