Florida Department of Environmental Protection

South District Office
Post Office Box 2549
Fort Myers, Florida 33902-2549

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr.
Secretary

October 4, 2011

CERTIFIED MAIL 7010 1870 0001 8477 0557
RETURN RECEIPT REQUESTED

Mr. Jose F. Alvarez, Executive VP Operations & General Manager
Sugar Cane Growers Cooperative of Florida
1500 West Sugar House Road
Belle Glade, Florida 33430

Re: Title V Air Operation Permit Renewal
Proposed Permit No. 0990026-016-AV
Glades Sugar House

Dear Mr. Alvarez:

One copy of the PROPOSED permit determination for the renewal of the Title V air operation permit for the Glades Sugar House located in Palm Beach County at 1500 West Sugar House Road, Belle Glade, Florida 33430, is enclosed. This letter is only a courtesy to inform you that the draft permit has become a PROPOSED permit.

An electronic version of this determination has been posted on the Division of Air Resource Management's world wide web site for the United States Environmental Protection Agency (USEPA) Region 4 office's review. The web site address is:

"http://www.dep.state.fl.us/air/emission/apds/default.asp"

Pursuant to Section 403.0872(6), Florida Statutes, if no objection to the proposed permit is made by the USEPA within 45 days, the proposed permit will become a final permit no later than 55 days after the date on which the proposed permit was mailed (posted) to USEPA. If USEPA has an objection to the proposed permit, the final permit will not be issued until the permitting authority receives written notice that the objection is resolved or withdrawn.

If you have any questions, please contact the Project Engineer, Susan Machinski, by telephone at (239) 344-5663 or by email at susan.machinski@dep.state.fl.us.

Sincerely,

_____

Jon M. Iglehart
Director of
District Management

JMI/SRM/jw
Enclosures
cc: 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
Ms. Tammy McWade, FDEP, Tallahassee: tammy.mcwade@dep.state.fl.us
Ms. Katy Forney, U.S. EPA Region 4: forney.kathleen@epamail.epa.gov
Ms. Ana Oquendo, EPA Region 4: oquendo.ana@epamail.epa.gov
Ms. Barbara Friday, DEP BAR: barbara.friday@dep.state.fl.us (for posting with U.S. EPA, Region 4)

PROPOSED PERMIT DETERMINATION
Proposed Permit No. 0990026-016-AV

I. Public Notice.

An Intent To Issue A Title V Air Operation Permit to Sugar Cane Growers Cooperative of Florida for the Glades Sugar House located in Palm Beach County at 1500 West Sugar House Road, Belle Glade, Florida 33430, was clerked on August 23, 2011. The Public Notice Of Intent To Issue A Title V Air Operation Permit was published in The Sun newspaper on September 1, 2011. The draft Title V air operation permit was available for public inspection at the permitting authority's office in Fort Myers. Proof of publication of the Public Notice Of Intent To Issue A Title V Air Operation Permit was received on September 16, 2011.

II. Public Comment(s).

No comments were received from the Public during the 30 (thirty)-day public comment period, however, comments were received from the Permittee and the Local Program. The comments were not considered significant enough to reissue the draft Title V permit and require another Public Notice, therefore, the draft Title V operation permit was changed. Those comments are addressed below.

Letter from Mr. David Buff, P.E. of Golder Associates, Inc. dated September 13, 2011.

Comment 1. *Condition A.5. should state that the water flow rate to each scrubber is being continuously measured, not continuously monitored. This should also be reflected the same in the permitting note.*

Response 1. The Department agrees. The condition has been changed.

Comment 2. *Condition A.9. Boiler No. 4 particulate matter emissions limit should be 0.20 lb/mmBtu for carbonaceous fuels and not 0.25 lb/mmBtu.*

Response 2. The Department agrees. Condition A.9 has been changed.

Comment 3. *Condition A.34 (now A.32) incorrectly listed the conditions referenced in condition A.9. Please change to state A.1., A.8., A.9. and A.10 (limits for permitted capacity, NOx, PM and VOC).*

Response 3. The Department agrees with the comment except for permitted capacity. Condition A.34. (now A.32) is for recordkeeping of boilers' hours of operation and steam flow to determine heat input for compliance demonstration. The permit does not specify heat input limits with regard to permitted capacity. Condition A.34. (now A.32) has been changed to state A.8., A.9. and A.10 (limits for NOx, PM and VOC).

Comment 4. *Revise the heading in Subsection B to specify Emissions Unit 006.*

Response 4. The Department agrees. The heading has been changed.

Comment 5. *Condition F.2 in Permit No. 0990026-015-AC should be in subsection B for Boiler 8.*

Response 5. The Department agrees. Condition F.2 in Permit No. 0990026-015-AC has been added to subsection B for Boiler 8. Condition F.2. is condition B.2 in the Title V permit 0990026-016-AV.

Comment 6. *Condition B.6. (now B.7.) should clarify that the total pressure drop and total water flow is to be measure to **each** scrubber..*

Response 6. The Department agrees. The condition has been changed.

Comment 7. *Condition B.24. (now B.25.) refers to incorrect specific conditions.*

Response 7. The Department agrees. The condition has been changed.

Comment 8. *It is requested that condition B.27. (now B. 28.) for VOC test methods be revised to include test methods 25A and 18.*

Response 8. The Department has revised condition B.27 (now B. 28.) to include the two test methods. This condition was revised in the concurrently processed air construction permit no. 0990026-015-AC/PSD-FL-077A.

Comment 9. *Condition B.29 (now B.30.) states that test reports shall be submitted to the South District and to Palm Beach County Public Health Unit within 45 days of completion of the test. Please remove as this is addressed in Appendixes TR and RR.*

Response 9 The Department agrees. The last sentence of condition B.29 (now B. 30) has been deleted.

Comment 10. *In all the tables in Appendix CAM please delete the parenthetical phrase (once per day required) and replace "continuously" with "reading taken once every eight hours".*

Response 10. The Department agrees. The tables have been corrected.

Comment 11. *In the tables for Boilers 4, 5 and 8 in Appendix CAM, please correct typographical errors, clarify that for Boilers 4 and 5 indicator 2 excursion is defined as any "total" water flow rate below… and clarifiers indicator no 2 excursion for Boiler eight is applicable to each scrubber.*

Response 11. The Department agrees. Appendix CAM tables have been changed.

<u>Email from Laxmana Tallam of Palm Beach County Health Department dated September 16, 2011.</u>

Comment 1. *The maximum permitted heat input rate (mmBtu/hr) is missing for Boilers 1 thru 5.*

Response 1. The Department disagrees. These boilers were never originally permitted with federally enforceable air construction permits that limited these boilers heat input rate. Therefore, heat input rate limitations are not be in the Title V permit. The Department believes that a maximum steam production rate permitted capacity is sufficient.

Comment 2. *Please clarify that contaminated solid is non-hazardous in condition A.2.a.4.*

Response 2. The Department agrees. Condition A.2.a.4 has been changed.

Comment 3. *Clarify in condition A.3.a that the hours of operation limitation is for all five boilers.*

Response 3. Condition A.3.a has been clarified.

Comment 4. *Please clarify why the sulfur limits in condition A.8. of Permit no. 0990026-012-AV have been removed.*

Response 4. The sulfur limits have not been removed. Please see condition A.12.

Comment 5. *Conditions A.17 and A.16 are inconsistent with regards to how the fuel usage is to be monitored. Condition A.17 says every eight hours while condition 16 says continuously.*

Response 5. Condition 17 have been removed from the permit.

Comment 6. *Condition A.18. (now A.17.) does not state frequency of monitoring or required recordkeeping.*

Response 6. This information is in Appendix CAM. A permitting note has been added referencing Appendix CAM.

Comment 7. *Condition A.21. (now A.20.) needs to be revised to include Boilers 2 thru 5.*

Response 7. The Department agrees. The condition has been changed.

Comment 8. *Are the permitted limits in condition A.6. the same as in 40 CFR 279.11.*

Response 8. The permitted limits are the same.

Comment 9. *The referenced permit conditions in condition A.33 (now A.31.) and A.34 (now A.32.) do not match.*

Response 9 The Department agrees. Conditions A.33 and A.34 (now A.31. and A.32.) have been changed.

Comment 10. *The CAM plan tables in Appendix CAM should read orifice meter instead of pressure transducer for indicator no. 2. Also Boiler 5 table shows the incorrect pressure drop indicator range and water flow indicator range.*

Response 10. The Department agrees. The tables have been corrected.

Comment 11. *Several typographical errors were pointed out.*

Response 11. The typographical errors have been corrected.

III. Conclusion.

The enclosed proposed Title V air operation permit includes the aforementioned changes to the draft Title V air operation permit. The permitting authority will issue the proposed permit number 0990026-016-AV, with the changes noted above.